

FILED

JAN 12 2004

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION

PEGGY B. DEANS, CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF N.C.

IN RE:	)	
	)	
INTERNATIONAL HERITAGE, INC.	)	Case No. 98:02675-5-AVS
(TAX ID#: 56-1921093)	)	CHAPTER 7
	)	
INTERNATIONAL HERITAGE	)	Case No. 98:02674-5-AVS
INCORPORATED	)	CHAPTER 7
(Tax ID#: 87-0421191)	)	
	)	
Address: 2626 Glenwood Avenue, Suite 200	)	SUPPLEMENTAL FILING
Raleigh, NC 27608	)	BREACH OF SETTLEMENT
	)	FILED OCTOBER 29, 2003
Debtors.	)	

**MOTION FOR FORMAL INVESTIGATION FOR IMPROPRIETY BY TRUSTEE  
HOLMES P. HARDIN**

**MOTION TO REMOVE IHI TRUSTEE HOLMES P. HARDIN AND STAY  
DISBURSEMENT OF ATTORNEY FEES AND EXPENSES**

**MOTION TO STAY IHI DISBURSEMENTS**

**MOTION FOR AN EVIDENTIARY HEARING**

**Introduction**

This matter is set for hearing on 27 January 2004 on Van Etten's Notice and Complaint for Breach of Settlement Agreement with Trustee and Request for Intervention and Resolution. Van Etten now submits this Supplemental Filing with attached Affidavit regarding additional breaches of the Settlement Agreement.

The Settlement Agreement resolved several pending matters and, as sanctioned by this Court, afforded Van Etten various protections. Notwithstanding the understandings reflected in the Settlement Agreement, Van Etten and others formerly associated with International Heritage, Inc. and International Heritage Incorporated (collectively referred to as "IHI") are the subject of a pending federal criminal prosecution. As a result of the IRS improper taking of monies that is the subject of Van Etten's pending motion in this Court, Van Etten has been deprived of the funds necessary to retain the counsel of his

choice and, consequently, has been defending the criminal case pro se. In his pro se capacity, Van Etten has nevertheless recently discovered evidence showing that Bankruptcy Trustee not only breached the Settlement Agreement with respect to the tax issues, but also breached the Settlement Agreement through a pattern of collusion and self-dealing that has resulted in a wholesale abuse of Van Etten's rights. As explained in more detail below, the Trustee, acting in collusion with the US Attorney and the SEC, released a huge volume of attorney-client documents before this Court approved the waiver of IHI's privilege, a release that unquestionably included attorney-client communications with Van Etten individually and others, then sought this Court's approval of the waiver of the corporate attorney-client privilege to benefit not the estate or creditors but himself and the US Attorney. Van Etten respectfully requests that the Court order an investigation into the propriety of the actions of the Trustee and stay IHI disbursements pending an eventual evidentiary hearing.

#### Breach of Attorney-Client Privilege

Van Etten's Attorney-Client Privilege and the breach by Trustee Hardin is within the Settlement Agreement approved by this Court and is the same Agreement this Court is hearing on January 27, 2004. Attached to Van Etten's previously filed Notice and Complaint for Breach of Settlement Agreement with Trustee and Request for Intervention and Resolution, is attached Exhibit 1 which contains the language on page 2, paragraph 11 pertaining to the privilege and protection;

"Van Etten shall withdraw his objection to the Trustee's Application to Enterinto Stipulation and Consent to Final Judgment of Permanent Injunction; however, VanEtten will not withdraw his objection to the Trustee's waiver of the Debtor's attorney-client privilege; Furthermore, Van Etten will not waive his attorney-client privilege; Van Etten will waive argument relating to his objection to the Trustee's waiver of the attorney-client privilege;"

In Van Etten's criminal matter, the Government recently admitted that they were in possession and obtained documents in violation of Van Etten's attorney-client privilege. On December 23, 2003 the United States' filed "Motion Requesting the Court to Appoint a Special Master to Assess Claims of Attorney-Client Privilege" which states therein;

"the United States is requesting the appointment of an impartial Special Master to assess defendants claims of attorney-client privilege with respect to two categories of documents: (1) documents obtained by the United States via search warrant during the investigation of the matter; and (2) documents subpoenaed or requested by the United States from former attorneys for International Heritage, Inc. during the investigation of this matter..."

"the United States summoned a "Taint Team" from the U.S. Attorney's Office in the Eastern District of Virginia, consisting of a Supervisory Assistant United States Attorney (AUSA) and an AUSA. This Taint Team conducted a review of the seized documents on October 8, 2003, and an additional Taint Team consisting of a Supervisory AUSA, two AUSAs, and one paralegal returned on November 5-6, 2003. The Taint Team reviewed the seized documents and has made a preliminary determination that several documents are arguably covered by attorney-client privilege."

As explained in more detail below, the Trustee, acting in collusion with the US Attorney and the SEC, released a huge volume of attorney-client documents prior to this Court's approval of the waiver of IHI's privilege, a release that unquestionably included attorney-client communications with Van Etten individually and others. Thereafter, Holmes Hardin sought this Court's approval of the waiver of the corporate attorney-client privilege to benefit not the estate or creditors but himself and the US Attorney. The following Exhibits are being submitted as evidence of the aforementioned and other allegations herein:

- Government Table of Evidence Exhibits for IHI Bankruptcy Trustee Production attached hereto as Exhibit 1.
- Government Table of Evidence Exhibits for IHI Bankruptcy Trustee Production, by and through the release of more than 1,500 Banker Boxes within his custody and control, attached hereto as Exhibit 2.
- IHI Mainframe Computer System and other electronic files, released to the U.S. Attorney prior to the issuance of a Search Warrant or Grand Jury Subpoena, and subsequently used in violation of attorney-client privilege.
- Government Table of Evidence Exhibits for Wood & Francis Production, attached hereto as Exhibit 3.

Van Etten's attorney-client privilege has been violated by the Government and the IHI Bankruptcy Trustee, in the wrongful production of tens of thousands of pages of documents and records, electronic files and communications and other protected information, to include those stored on IHI and Van Etten computers, produced to the

Government, in violation of the Settlement Agreement. Filed pursuant to this Court's June 7, 2000 Order is Van Etten's July 10, 2000 Memorandum of Law attached as Exhibit 4 which contains a detailed description of all lawyers and law firms and identifying privilege documents by those representing Van Etten individually and in his capacity as President and CEO, both protected by the Honorable A. Thomas Small's Order thereto, with detailed accounting and records of all attorney-client privilege and work product documents, records and communications.

**Debtor History**

IHI incorporated for business in April of 1995. IHI hired Stanley H. Van Etten as President and CEO in November of 1995. In March of 1998, IHI began to trade its stock publicly, NASDAQ stock market, symbol IHIN. IHI stock traded as high as \$36 per common share and was owned by more than 4,000 public shareholders. The Company employed 250 full-time employees and had more than 175,000 independent sales representatives throughout the United States and Canada. Annual sales for the Company were in excess of \$100 million.

In March of 1998, the Securities and Exchange Commission ("SEC") filed a securities fraud civil action in U.S. District Court, for the Northern District of Georgia, the Honorable Richard W. Story Presiding, against the Company and Stanley H. Van Etten individually. As a result of the SEC action in U.S. District Court and other related actions, IHI filed for bankruptcy protection on November 25, 1998, in the Eastern District of North Carolina.

In June of 1999, Van Etten submitted himself to a multimillion dollar multi-jurisdiction, Federal-State-Regulatory, Settlement Agreement, which included the Securities and Exchange Commission ("SEC"), the IHI Trustee, U.S. District Court NDGA, U.S. Bankruptcy Court EDNC, Van Etten, the Government and others, which relieved Van Etten of ALL issues and responsibilities as President and CEO of the Company and indemnified Van Etten from any and all claims and causes of action accrued through the date of the Settlement Agreement.

Over the past several months of new discovery in Van Etten's criminal matter, Van Etten has only now confirmed a multitude of violations that pertain to this Court and this Settlement Agreement, including a collusive scheme involving the IHI Trustee, SEC

attorney and terminated for cause, Scott Wilkenson, former AUSA in charge of the IHI criminal investigation.

**Supplemental History**

Van Etten is the former President and CEO of International Heritage, Inc. and International Heritage Incorporated, collectively referred to as "IHI". IHI filed bankruptcy on November 25, 1998. On the same day, Holmes P. Hardin was appointed Chapter 7 Trustee on behalf of IHI. Brent Wood, Esq., entered his appearance on behalf of Van Etten on December 7, 1998. On January 4, 1999, Trustee Holmes Hardin filed a Motion to Employ Attorney (Holmes P. Hardin).

On January 11, 1999, Trustee Hardin filed a Motion for Authority to Cancel Insurance (TIG). TIG is the officers and directors liability insurance for IHI. The Trustee withdrew this motion on February 2, 1999. On January 15, 1999, Trustee Hardin filed an Application of Trustee to Enter into Stipulation and Consent to Final Judgment of Permanent Injunction. On January 4, 1999, Trustee Hardin filed a Motion to Self Employ with the court. On January 22, 1999, this Court approved Hardin's Motion to Self Employ.

On February 1, 1999, ACSTAR filed their Objection to the Trustee's Application to Enter into Stipulation and Consent to Final Judgment of Permanent Injunction. ACSTAR is the bonding company that took possession of Van Etten's five (5) million dollar cash bond posted with the Securities and Exchange Commission in Atlanta, GA. On February 2, 1999, Van Etten filed his Objection to the Trustee's Application to Enter into Stipulation and Consent to Final Judgment of Permanent Injunction. On February 10, 1999, ACSTAR filed their Amended Objection to Trustee's Application to Enter into Stipulation and Consent to Final Judgment of Permanent Injunction. On February 12, 1999, ACSTAR filed their Addendum to their Objection to Trustee's Application to Enter into Stipulation and Consent to Final Judgment of Permanent Injunction.

On February 18, 1999, Trustee Hardin filed an Application To Employ An Attorney - Brent Wood (Van Etten's legal counsel, without disclosure of a number of conflicts of interest, adverse, all without waiver). This conflict is discussed further herein. On February 19, 1999, an Order was entered allowing the Trustee to employ Brent Wood, Van Etten's legal counsel with adverse interest.

On April 29, 1999 ACSTAR filed their Memorandum in Support of Objection to Trustee's Application to Enter into Stipulation and Consent to Final Judgment of Permanent Injunction. On April 30, 1999 The Court Order denied Debtor's Counsel Request to Withdraw. On May 5, 1999 Counsel for Van Etten, H. Wyche, filed an Ex Parte Motion to Withdraw as counsel for Van Etten. On May 24, 1999 ACSTAR filed Motion to Intervene in Non-Bankruptcy Litigation. On June 22, 1999 Trustee Hardin filed an Application for Authority to Enter into Settlement Agreement with Van Etten and various Mayflower Companies. On July 22, 1999 an Order granted the Trustee the authority to enter into the Settlement Agreement with Van Etten. On October 6, 1999 ACSTAR withdrew their Motion to Intervene in Non-Bankruptcy Litigation.

**Relevant Background for Motion**

On October 29, 2003, Van Etten filed with this court a "Notice and Complaint for Breach of Settlement Agreement with Trustee and Request for Intervention and Resolution". The IHI Trustee did not file a response to Van Etten's Complaint in U.S. Bankruptcy Court, therefore, Van Etten contends the Breach is Uncontested and Uncontradicted. This court set this matter for hearing on January 27, 2004.

In related proceedings, as explained herein, Van Etten is defending himself, Pro Se, against criminal charges in the Eastern District of North Carolina before the Honorable Chief U.S. Judge, Terrence W. Boyle, for the exact same facts, issues and allegations of wrongdoing for which Van Etten previously settled in the Settlement Agreement, whereby assured of protection from additional prosecution. The criminal charges arise from Van Etten's employment as President and CEO of IHI. After conducting a hearing and reviewing the entire record, U.S. District Judge, Richard W. Story, stated "However, this Court declines to conclude that Defendants IHI and Stanley Van Etten violated Section 15 (d) of the Exchange Act or Rule 15d-11. At this point, there is an insufficient basis in the evidence to support a violation of either provision."

Since Van Etten's election to "self-representation" and a Pro Se defense in his criminal action, as of August of 2003, Van Etten has devoted himself to discovery of information held exclusively by the U.S. Attorney's Office and Government. It is within this new discovery that Van Etten has discovered information implicating IHI Trustee

Holmes Hardin and others in a collusive scheme in violation of Van Etten's Settlement Agreement, his Civil Rights and Civil Liberties.

The collusive scheme was initiated by, terminated for cause, former AUSA and attorney in charge of this matter, Scott Wilkinson, in December of 1998, with SEC attorney in charge of this matter, Bill Hicks, who jointly solicited and engaged IHI Trustee, Holmes P. Harden, into the scheme. IHI Trustee, Holmes P. Harden, joined the collusive scheme on January 4, 1999.

Van Etten's recent discovery and confirmation of a collusive scheme in this forum requires and necessitates the immediate notification to the Court and all interested parties. Among the violations, Van Etten alleges are: massive violations of attorney-client privilege, collusive improprieties, self-dealing, unjust enrichment, violations of ethics and rules of professional conduct, numerous conflicts of interest, some of which are clearly adverse and collusive, which cannot be waived.

#### Argument

##### **(1) RELEASE OF ATTORNEY-CLIENT PRIVILEGE COMMUNICATION TO U.S. ATTORNEY'S OFFICE PRIOR TO JUDGE SMALL'S ORDER**

The Government in Van Etten's criminal case relies heavily on a Order dated June 27, 2000 from Bankruptcy Judge, A. Thomas Small Allowing Motion for Approval of Compromise and Settlement to defending their actions in obtaining attorney-client and work product privilege communication. As the court may recall, Van Etten aggressively asserted his rights to privilege, individually and as a corporate officer. Bankruptcy Judge, A. Thomas Small states on page six in the Order Allowing Motion for Approval of Compromise and Settlement:

"Instead, the only issue before the court is whether, in this corporate bankruptcy, the trustee is empowered to assert the privilege on behalf of the debtors and, if so, whether he may also elect to waive it. That question is conclusively resolved in Weintraub."

The Court further states:

"The Court specifically finds that the trustee holds the privilege on behalf of the corporate debtors and that he can and has waived that privilege. The court also acknowledges that many issues remain open for resolution. The court makes no finding regarding documents presently withheld on grounds that they come within the work-product doctrine, or regarding documents that

include confidential communications between attorneys and individuals seeking legal counsel in their individual capacities.”

For the moment, the issue before this Court is not whether IHI expressly waived its attorney-client privilege but whether Defendant Van Etten’s individual attorney-client privilege as well as his corporate officer privilege and attorney work product has been violated by Trustee Holmes Hardin in the wholesale releasing IHI records to AUSA Scott Wilkinson and the U.S. Attorney’s Office.

IHI Trustee Holmes Harden, previous to Judge Small’s Order, turned over a very large amount of documents and records, communications, computers, computer backup tapes and electronic files to the U.S. Attorneys Office starting on April 30, 1999, more than a year premature to Judge Small’s ruling. The Government’s Table of Evidence Inventory in the criminal case conclusively proves the “Box #’s”, the “Source” and the “Date Received”. From April 30, 1999 through September 21, 1999, the U.S. Attorney’s Office received 131 banker boxes of records and documents from Trustee Hardin. See the four page excerpt of the Government’s Table of Evidence attached hereto as Exhibit 1.

Further, the IHI mainframe computer was in the custody and control of Trustee Hardin. The mainframe computer was delivered to the U.S. Attorney’s Office on or about October 24, 2002. FBI Special Agent Joan Fleming possesses the password to the mainframe and the week of Thanksgiving 2003, the mainframe was turned on by Richard Jarmon, HP representative and is now operating. The U.S. Attorney’s Office is currently operating the mainframe computer. There is and has not been any oversight to the contents of the mainframe or to the privileges that may be contained therein. The computer should not have been turned over to the U.S. Attorney’s Office until the contents were reviewed for attorney-client and work product privilege communication.

Lastly, Infostor is a document storage company. Infostor was storing IHI documents and records and Trustee Hardin had custody and control of those records. Infostor has released 1,567 boxes from January of 1999 to January of 2000 to the U.S. Attorney’s Office under Trustee’s authority. See the Government’s Table of Evidence excerpt pages attached hereto as Exhibit 2. Trustee Hardin has made no independent

review of these records or any other party qualified to do so to determine the contents of attorney-client privilege communication and work product privilege.

Not only did the IHI Trustee allow the Government to take possession of these documents and records, computers and electronic files in “wholesale,” and in advance of any Court Authority, the IHI Trustee failed to take any corrective action after the fact to comply with any of Judge Small’s provisions within the Order.

The U.S. Attorney’s Office has recently admitted that they were in possession and obtained documents in violation of Van Etten’s attorney-client privilege. On December 23, 2003 the United States’ filed “Motion Requesting the Court to Appoint a Special Master to Assess Claims of Attorney-Client Privilege” which states therein;

“the United States is requesting the appointment of an impartial Special Master to assess defendants claims of attorney-client privilege with respect to two categories of documents: (1) documents obtained by the United States via search warrant during the investigation of the matter; and (2) documents subpoenaed or requested by the United States from former attorneys for International Heritage, Inc. during the investigation of this matter...”

“the United States summoned a “Taint Team” from the U.S. Attorney’s Office in the Eastern District of Virginia, consisting of a Supervisory Assistant United States Attorney (AUSA) and an AUSA. This Taint Team conducted a review of the seized documents on October 8, 2003, and an additional Taint Team consisting of a Supervisory AUSA, two AUSAs, and one paralegal returned on November 5-6, 2003. The Taint Team reviewed the seized documents and has made a preliminary determination that several documents are arguably covered by attorney-client privilege.”

See Attached Exhibit 5, page , paragraph .

IHI Trustee Holmes Harden failed to review any documents and records, computers and communications for compliance with the your Honor’s Order, as Defendant Van Etten and several others have aggressively asserted their attorney-client privileges, in their corporate capacity and individually, which your Honor went to great lengths to protect and preserve. Unfortunately, IHI Trustee Holmes Harden had already produced everything within his custody and control to AUSA Scott Wilkinson, U.S. Attorney’s Office, SA FBI Joan Fleming and SA IRS Scott Schiller.

The Government's Table of Evidence irrefutable proves that every IHI executive who asserted their attorney-client privilege, that their documents and records, communications and electronic files were also "wholesale" turned over to the Government without any review or court authority, more than a year premature to Judge Small's ruling, in another flagrant violation of your Honor's Order.

**(2) CONFLICTS OF INTEREST/ETHICS**

- A. *Between Holmes Hardin as Trustee of IHI and Holmes Hardin, self-appointed Attorney.*

On January 4, 1999, Trustee Hardin filed a Motion to Self Employ with the court. On January 22, 1999, this Court approved Hardin's Motion to Self Employ. Hardin should not have been permitted to act as the Trustee and as self appointed Attorney on behalf of IHI. The SEC bond money was Van Etten's personal money and not part of the IHI estate. Hardin as either Trustee or Attorney, had no rights to the SEC bond money. Hardin received a huge economic benefit from acting as Attorney and Trustee and successfully bringing the SEC bond money into the IHI Estate.

- B. *Between Brent Wood as legal counsel to Van Etten and Brent Wood as special counsel to Trustee Hardin and IHI.*

Brent Wood, Esq., entered his appearance on behalf of Van Etten on December 7, 1998. On February 18, 1999, Trustee Hardin filed an Application To Employ An Attorney - Brent Wood (Van Etten's legal counsel with adverse interest). A day later, on February 19, 2002 an Order was entered allowing the Trustee to employ Brent Wood, Van Etten's legal counsel with adverse interest. Van Etten was and is unaware of the scope of Brent Woods duties as special counsel to IHI but it is obviously a clear conflict that was not and has not been waived by Van Etten. Brent Wood's affidavit to this Court is materially false and misleading to this Court. See Wood's Affidavit attached hereto as Exhibit 6. The allegations against the Wood & Francis have been communicated to both partners, Brent Wood and Charles Francis. A third letter sent to Charles Francis that describes in detail the allegations is attached hereto as Exhibit 7. Please read the six page letter in its entirety.

**(3) COLLUSION BY AND AMONG IHI TRUSTEE, BRENT WOOD, SEC AND U.S. ATTORNEYS OFFICE / CONSPIRACY TO DEPRIVE CIVIL RIGHTS**

Since early 1996, IHI and Van Etten were personally investigated, accused and threatened with criminal prosecution by the North Carolina Attorney General ("NCAG"). On June 3, 1997 Van Etten executed the NCAG Agreement individually as well as in his corporate capacity. In May 1997 the SEC started their investigation into IHI. Van Etten was named personally in the SEC proceedings. On September 20, 1999 a Final Judgment of Permanent Injunction as to Defendant Stanley H. Van Etten was docketed. See attached hereto as Exhibit 8. The Settlement Agreement with the IHI Chapter 7 Trustee was contingent upon the SEC Agreement and Van Etten signed in his individual capacity and relinquished many of his legal rights. Van Etten posted a 5 million dollar surety penal bond that eventually went into the IHI bankruptcy estate.

The Securities Exchange Commission and the Bankruptcy Trustee Holmes Hardin for the IHI Bankruptcy Estate solicited Defendant Van Etten's counsel to settle the Civil Action with Stanley H. Van Etten and International Heritage, Inc. The Honorable Judge Richard W. Story reviewed and approved the settlement by entering a Final Judgment of Permanent Injunction as to Defendant Stanley H. Van Etten on September 20, 1999.

As part of the settlement, Defendant Van Etten agreed to assign his personal \$5,000,000.00 surety bond, posted for the benefit of International Heritage, Inc., to the settlement and thereby the Court ordered "disgorgement against IHI in the amount of \$6,533,179.00 of which \$4.1 million may be satisfied from a posted surety bond by Stanley H. Van Etten, by way of his consent." In addition, the Court ordered "disgorgement against Stanley H. Van Etten in the amount of \$7,630,450.00, reduced and required installment payments totaling \$150,000.00, required Van Etten to waive certain claims against the bankruptcy estate of IHI, and waived the remaining disgorgement, prejudgment and post-judgment interest." In addition, Van Etten assigned an additional \$2.7 million in secured loans made to International Heritage to the IHI Bankruptcy Estate (loans were of the highest security and first in time, so the Trustee wanted them, as there was money in the estate) for the purpose of investor restitution from the \$4.1 million dollar IHI bond offering, funding of unpaid IHI employee payroll, payment of fees owed

to the Court Appointed Monitor, reimbursement of investigative costs to the SEC, IHI taxes and unsecured creditor claims. In the settlement with the SEC and IHI Estate, Etten contributed approximately \$7.2 to \$7.7 million dollars. More specifically, Van Etten and IHI consented to the entries of the Judgments without admitting or denying any of the allegations of the Securities and Exchange Commission's complaints and all outstanding issues were to be resolved, allegedly.

On October 7, 1999 the Honorable Judge Richard W. Story of the United States District Court, for the Northern District of Georgia, Atlanta Division, entered a Consent to Final Judgment of Permanent Injunction as to Defendants International Heritage, Inc., International Heritage Incorporated, and Stanley H. Van Etten. See attached Exhibit 9.

Upon the settlement of the Securities Exchange Civil proceeding and Bankruptcy Settlement Agreement, the attorneys representing Van Etten were the Law Firm of Wood & Francis, LLP, attorneys Brent Wood and Charles Francis, remained as general counsel to IHI and individual counsel to Stanley H. Van Etten, and later the Law Firm of Tharrington Smith, attorneys Wade Smith and Melissa Hill, were brought in to represent Mr. Van Etten individually. It was only a short period of time after the announced Civil Settlement with the Securities Exchange Commission that the secret "Bogus Bonds" criminal investigation became public knowledge, which was previously unknown and not disclosed to Defendant Van Etten at the time of the settlement.

In the year 2001, Defendant Van Etten's attorney, Mr. Brent Wood, received a target letter from the United States Attorneys' Office, he continued to represent Defendant Stanley H. Van Etten, but later withdrew in 2002.

The U.S. Attorney's Office, the SEC, the NCAG and the Chapter 7 Bankruptcy Trustee and to some extent, Brent Wood, all worked together and their agreements reflect their cooperation and collusion to defeat Van Etten of all of his personal property and legal rights. The end result subjected him to multiple punishments. After the NCAG Agreement, the SEC Agreement and the Bankruptcy Agreement, the IHI Bankruptcy Trustee waived IHI's attorney-client privileges. IHI privileges were waived at the request of terminated former AUSA Scott Wilkenson. The IHI estate received no benefit for the waiver.

No one can argue with a straight face that the SEC and the Chapter 7 Bankruptcy Trustee didn't work together. The question remains as to the extent of the IHI Bankruptcy involvement with the U.S. Attorney's Office, the SEC and the NCAG. Van Etten previously explored this inquiry. Plaintiff SEC's Response to Defendants' First Interrogatories and Requests for the Production of Documents in July 22, 1998 state:

Interrogatory No. 1: "Identify any and all persons who have given testimony or been interviewed by Plaintiff in connection with the investigation."

SEC: "The Commission objects to the interrogatory to the extent it calls for the production of information subject to the attorney client, law enforcement or government deliberative process privilege, or is protected by the work product doctrine."

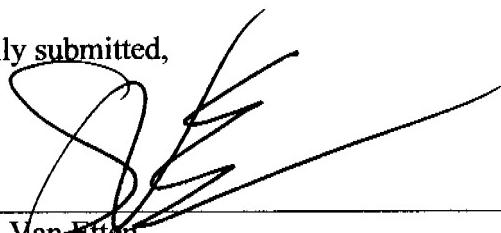
The Agreements reflect their contingency, cooperation and collusion to defeat Van Etten of all of his property (i.e. 5 million dollar bond, officer and director's insurance), his ability to defend himself, his pursuit of Life, Liberty and Happiness, while subjecting him to multiple State and Federal investigations and prosecutions, all of which have deprived Van Etten and every member of his family of their Civil Rights and Civil Liberties. Van Etten diligently relied upon his lawyers at Wood & Francis and Kutak Rock, followed all of their advice, including the Settlement Agreement, without the full knowledge and required disclosure of significant conflicts of interest, adverse interest conflicts and the collusive scheme for which Van Etten and his attorneys became trapped in, denying Van Etten his right to independent and adequate legal counsel prior to entering into the Settlement Agreement, based upon the recently confirmed information and discovery herein.

The Bankruptcy Trustee and SEC settlement agreements were contingent upon one another. The sole purpose of this contingency was designed to allow the IHI Trustee to bring in the 5 million dollar bond that Van Etten individually posted with the SEC into the IHI estate. The bond was not subject to the Bankruptcy Court. In exchange, IHI Trustee would receive the commission fee as he was already approved as attorney for IHI in addition being the Trustee. In turn, Trustee Hardin would waive the IHI attorney-client privilege for the U.S. Attorney's Office in Raleigh, NC.

**Conclusion**

Therefore, for the foregoing reasons, Stanley H. Van Etten respectfully requests this Court to order a formal investigation to the alleged impropriety of Holmes P. Hardin and stay further disbursement of his fees and expenses, stay the IHI disbursements until a complete investigation is conducted and findings are made, schedule an evidentiary hearing and remove Holmes P. Hardin as the IHI Trustee.

Respectfully submitted,

  
\_\_\_\_\_  
Stanley H. Van Etten

**STATE OF NORTH CAROLINA )  
                                )  
WAKE COUNTY                 )      SS:                   AFFIDAVIT**

**STANLEY H. VAN ETSEN**, first being duly sworn according to law, deposes and states the following:

1. AFFIANT states that he is a citizen and resident of Wake County, Raleigh, North Carolina.
2. AFFIANT further states that he was a former CEO and President of IHI and the largest secured creditor in the IHI Chapter 7 bankruptcy.
3. AFFIANT further states he is the party to the June 22, 1999 Settlement Agreement with IHI Trustee Holmes P. Hardin.
4. AFFIANT further states that he is pro se in his criminal matter before the Honorable Judge Terrence Boyle.
5. AFFIANT further states that the withholding of the IRS refund and breach of Settlement Agreement has deprived him of hiring effective counsel on his behalf in the criminal proceedings.
6. AFFIANT further states that he recently discovered evidence showing that Bankruptcy Trustee not only breached the Settlement Agreement with respect to the IRS refund issues, but also breached the Settlement Agreement through a pattern of collusion and self-dealing that has resulted in a wholesale abuse of Van Etten's rights.
7. AFFIANT further states that he was not fully advised of Brent Wood's capacity as a special counsel to Trustee Hardin and IHI and has never consented to that relationship.

8. AFFIANT further states that the information contained in his Supplemental filing is true and accurate to the best of his knowledge.
9. AFFIANT further states that he is available to attend a hearing and is willing to swear before the court to the facts contained herein.

AFFIANT FURTHER SAYETH NAUGHT.



STANLEY H. VAN ETSEN

SUBSCRIBED AND SWORN TO BEFORE ME in my presence this 8<sup>th</sup> day of January, 2004.

Michael J. Pittendreath  
NOTORY PUBLIC

Commission expires June 23, 2007  
North Carolina  
Wake County

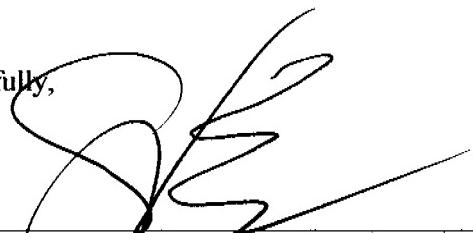


**CERTIFICATE OF SERVICE**

This is to certify that I have this 8th day of January 2004, served a copy of the foregoing upon the below by regular U.S. Mail:

Holmes P. Hardin  
Chapter 7 Trustee  
P.O. Drawer 19764  
Raleigh, NC 27619

Respectfully,

  
Stanley H. Van Etten

## IHI RECORDS / EVIDENCE INVENTORY

EXX. BOX #	SOURCE	INFO. Store	STORE Box #	ACCT NO.	DATE RECEIVED	DOC DATE	ADRESSEE	DOC DATE	CONTENTS	JURID
CODE					4/30/1999	4/30/1999	AUTHOR FROM TO			
T	1	Trustee			4/30/1999	X			IHI "Starter Kit"	No
T	2	Trustee			4/30/1999	X			IHI Complaint Letters / Refund requests (-)	Yes
T	3	Trustee			4/30/1999	X			IHI Official correspondence w/ states re taxes etc	Yes
T	4	Trustee			4/30/1999	X			Independent Rep. Apps. Product orders Auto Ship Enroll	Yes
T	5	Trustee			4/30/1999	X			Tyra Skincare Products	Yes
T	6	Trustee			4/30/1999	X			Unpaid vendors (Box 1)	Yes
T	7	Trustee			4/30/1999	X			Unpaid vendors (Box 2)	Yes
T	8	Trustee			4/30/1999	X			Misc. Bank Statements, Correspondence, NSF Notices	Yes
T	9	Trustee			4/30/1999	X			Autoship Cancellations; Buyout requests	Yes
T	10	Trustee			4/30/1999	X			Heritage Essential's Supplements	Yes
T	11	Trustee			4/30/1999	X			Copies of Chap. 7 Bankruptcy Filings	Yes
T	12	Trustee			4/30/1999	X			IHI Rep Materials including product samples	Yes
T	13	Trustee			4/30/1999	X			IHI Misc. correspondence	Yes
T	14	Trustee			4/30/1999	X			IHI Misc. complaint letters / refund requests (+)	Yes
T	15	Trustee			4/30/1999	X			7 computer "backup" tapes from IHI K220 computer taken by search warrant	Yes
T	16	Trustee			8/18/1999	X				
T	17	Trustee			8/31/1999	X			NC Sales Rep Product Order/Retail Receipt Forms (primarily BTI) 1997	Yes
T	18	Trustee			8/31/1999	X			Credit Card Charge/Credit Requests (1998)	Yes
T	19	Trustee			9/34	91456	8/31/1999		Sales Rep Retail Receipt Forms (1997); Sales Rep Apps (1998); Sales Rep Newsletter re SEC Violations Lee CIS	Yes
T	20	Trustee			9/25	91456	8/31/1999		Bonus Run Reports' Weeks 1 to 36, 1997 through 1997	Yes
T	21	Trustee			9/20	91456	8/31/1999		Independent Sales Rep VUUG Forms (1997-1998)	Yes
T	22	Trustee					8/31/1999	X	Payroll Check Register for Printing Plus (1994); Billing Statements for Printing Plus	Yes
T	23	Trustee					8/31/1999	X	BTI Referrals (1997-1998)	Yes
T	24	Trustee					8/31/1999	X	Personnel Records re IHI employees accused of embezzlement; C. Foreman, Cadic Dobbins, etc.; Mike Russo's affidavit and investigative inquiries.	Yes
T	25	Trustee			908	91456	8/31/1999	X	IHI and "Heritage Essential's" Special Convention Order Forms from New Orleans Convention 1998	Yes
T	26	Trustee			903	91456	8/31/1999	X	Copies of Returned BTI paperwork	Yes
T	27	Trustee			911	91456	8/31/1999	X	Health Insurance and Labor Law Guides	Yes
T	28	Trustee			930	91456	8/31/1999	X	IHI "Independent" Retail Sales Representative Retail Receipt Forms (1998-398)	Yes
T	29	Trustee							Sales Rep WGs for 1997; Misc. computer software manuals and boxes	Yes
T	30	Trustee			908	91456	8/31/1999	X	RBA's Sales Rep Applications - Sept. 1997	Yes
T	31	Trustee			424	91456	8/31/1999	X	RBA's - Sept. 1997	Yes
T	32	Trustee			924	91456	8/31/1999	X	"Scanned" Sales Rep Applications 1995-96. (G.Mc)	Yes
T	33	Trustee			91456	91456	8/31/1999	X	Unashed checks; IHI and IHI of Canada FUNB acct #4553110400	Yes
T	34	Trustee			931	91456	8/31/1999	X	Sales Rep Apps 1197 - 498; VRS; Retail Product Order Forms; Retail Sales Form & Receipt	Yes
T	35	Trustee					8/31/1999	X	Box of Empty Mailing Envelopes	Yes
T	36	Trustee			919	91456	8/31/1999	X	Retail Sales Forms; Requests for Upgrade/Additions, Transfers, WGs	Yes
T	37	Trustee			907	91456	8/31/1999	X	Centrex Bank CC Disputes (A-N) through end of 2/98	Yes
T	38	Trustee			926	91456	8/31/1999	X	Print Promotional Retail Receipt Forms (5/30-31/97); Retail Sales Form & Receipt (Ontario, Alberta); Independent Retail Sale Rep Forms, UPS Bill (3/21/98); Bank Draft Authorizations	Yes
T	39	Trustee			929	91456	8/31/1999	X	Credit Card Chargebacks (398-898); Retail Sales Forms; BTI Referral Forms (197-598); NC Retail Sales Rep Applications (1998)	Yes
T	40	Trustee			932	91456	8/31/1999	X	Buyout Forms & Calculations; Correspondence & payments	Yes
T	41	Trustee			909	91456	8/31/1999	X	Independent Retail Sales Representative Retail Receipt Forms (1997)	Yes
T	42	Trustee			913	91456	8/31/1999	X	"Sponsor Forms" (List of People Sponsored by Individual Reps) (3/30/98); Misc RBA's; 1998 Convention "Product Order Forms"; Tax Forms, Sales Rep Apps	Yes
T	43	Trustee			918	91456	8/31/1999	X	Product Order Forms; BTI Referrals	Yes
T	44	Trustee			952	91456	8/31/1999	X	Misc. Retail Receipt Forms; "Problem" orders; RBA's 1997	Yes

**IHI RECORDS / EVIDENCE INVENTORY**

BOX CODE	BOX #	SOURCE	Site	I STORE	DATE RECEIVED	ORIG COPY	DOC BEGIN	DOC END	AUTHOR FROM TO	ADRESSEE	DOC DATE	CONTENTS	GRAND JURY
T	46	Trustee	57	91456	8/31/999	X						RBA's soned and entered by batch (Batches 15 to 90) US and Canada 1997	Yes
T	47	Trustee	91456	91456	8/31/999	X						RBA's: Sales Rep Apps, Order Forms, WGs, (1997)	Yes
T	48	Trustee										"Buyout" Correspondence; "Distributor Inquiry Tracking Entries" done by Orlando Watson for "Buy Out"	Yes
T	49	Trustee	91456	91456	8/31/999	X						Sales Aid Order Forms, Rep. Applications, Check registers, Product Order Forms (1987)	Yes
T	50	Trustee	928	91456	8/31/999	X						Independent Retail Sales Rep Apps (3497 - 597, 298); Retail Business Agreement (3497-597, 298); Retail Receipt Form (298); Order Form (298); Sales Rep Apps, Order Forms, WGs, (1997)	Yes
T	51	Trustee	901	91456	8/31/999	X						Credit Card Requests (1998)	Yes
T	52	Trustee	91456	91456	8/31/999	X						Commission Checks Run Off But Not Sent (8/1/998, 10/1/998, 8/27/998)	Yes
T	53	Trustee	244	91456	8/31/999	X						WGs from 2/98; Sales Rep Applications 4/98	Yes
T	54	Trustee	91456	91456	8/31/999	X						Uncashed Commission Checks from 8/1/998 and 9/1/998 in IHI Mailing Envelopes	Yes
T	55	Trustee	916	91456	8/31/999	X						Credit Card Credit Requests (1998)	Yes
T	56	Trustee	905	91456	8/31/999	X						Sales Rep Applications 4/98	Yes
T	57	Trustee	214	91456	8/31/999	X						Personnel Records from Human Resources	Yes
T	58	Trustee										Rep. Sales Receipt Forms - Feb. 1997	Yes
T	59	Trustee	912	91456	8/31/999	X						Rep. Sales Receipt Forms and Phone Disputes, Sales Rep Apps from Jan. 1998	Yes
T	60	Trustee										UPS Shipping Records (10/1/998)	Yes
T	61	Trustee										BII Referrals (1997)	Yes
T	62	Trustee	915	91456	8/31/999	X						WGs Forms - 1997	Yes
T	63	Trustee										WGs 1997	Yes
T	64	Trustee	904	91456	8/31/999	X						Personnel Records from Human Resources	Yes
T	65	Trustee										Misc. Docs that Appear to be Non-relevant and will be Retained to Trustee	Yes
T	66	Trustee										Empty File Folders and Mailing Envelopes	Yes
T	67	Trustee	914	61456	8/31/999	X						WGs 1996	Yes
T	68	Trustee										Rep. Manuals and Cost Guide; Product Catalogs; Internal Memos Re Personnel and Policy, Etc; Stock Offering Prospectus 1996; Credit Card Chargebacks	Yes
T	69	Trustee										Sales Rep Retail Receipt Forms Feb - March 1997	Yes
T	70	Trustee	927	61456	8/31/999	X						WGs	Yes
T	71	Trustee	917	91456	8/31/999	X						Personnel Files From Human Resources	Yes
T	72	Trustee	900	91456	8/31/999	X						BII Applications (4/2) 3/1/98 to 7/29/98	Yes
T	73	Trustee	910	91456	8/31/999	X						Personnel Files From Human Resources	Yes
T	74	Trustee	906	91456	8/31/999	X						Personnel Files From Human Resources	Yes
T	75	Trustee	902	91456	8/31/999	X						BII Enrollment April - May, 1998; Rep Problems Handled by Carla Brown; Check Request Forms	Yes
T	76	Trustee	412	91456	8/31/999	X						Historical Sponsor Forms" Completed by IHI Sales Reps	Yes
T	77	Trustee	933	91456	8/31/999	X						WGs 1996 (C-D)	Yes
T	78	Trustee	923	91456	8/31/999	X						UPS Daily Shipping Rpts; Misc Shipping Records for IHI Orders 8/1/995 to 10/31/995	Yes
T	79	Trustee										WGs 1997	Yes
T	80	Trustee	921	91456	8/31/999	X						Credit Card Chargebacks / disputes resulting in reps termination.	Yes
T	81	Trustee										Credit Card Disputes, Accordion file (Gata Brown's Work) containing: Phone Logs, Check Request Forms, Product Change / Cancellations Forms	Yes
T	82	Trustee										Refund Requests; Credit Card Cancellations	Yes
T	83	Trustee										Chargeback Files	Yes
T	84	Trustee										Commission Checks Not Sent	Yes
T	85	Trustee										Printing Plus Information, Unified Chargeback	Yes
T	86	Trustee										Printing Plus / Accounting	Yes
T	87	Trustee										BII Enrollment Forms January 97 - Sept 98	Yes
T	88	Trustee											
T	89	Trustee											
T	90	Trustee											
T	91	Trustee											

## IHI RECORDS / EVIDENCE INVENTORY

BLK CODE	BOX #	SOURCE	STORE	IS STORE Box #	ACCT NO.	DATE RECEIVED	ORIG COPY	DOC BEGIN	DOC END	AUTHOR FROM TO	DOC DATE	ADDRESSEE	
												CONTENTS	GRAND JURY
T 92	Trustee					8/31/998	X					BTI Enrollment Forms Employee Manual; 2 Binders of Check Cae Reports; Stop Payments & NSF Checks	Yes
T 94	Trustee					8/31/998	X					Miscellaneous Internal Forms; BTI Program Brochures; IHI Retail Product Catalogs; Info Store Records Index; Data Entry Procedures; Employee Blank Forms.	Yes
T 95	Trustee					8/31/998	X					Batches of Unpaid Commission Checks in Mailing Envelopes (9/1-9/8); 8/6/98; 9/1/98)	Yes
T 96	Trustee					8/31/998	X					BTI Enrollment Forms (Mostly 1997 - some 1998)	Yes
T 97	Trustee					8/31/998	X					BTI Enrollment Forms (1997)	Yes
T 98	Trustee					8/31/998	X					Sales Rep Applications (March '98); W9's, Retail Business Agreements (March '98)	Yes
T 99	Trustee					8/31/998	X					Sales Rep Applications; Product Order Forms; RBA's, "New Business" Forms, (1998)	Yes
T 100	Trustee					8/31/998	X					BTI Referrals (Some Labeled "Slams"); IHI Employee Note Book (1998) Containing Info on Compensation Plan & Policies & Procedures; Batch Details Forms / "Copies of Credits"; Retail Product & Cost Guide (4/98); BTI Enrollment Forms	Yes
T 102	Trustee					8/31/998	X					Inventory Equipment Slidesets [H] and Chargebacks	Yes
T 103	Trustee					8/31/998	X					Introduction to Team Building Module (44 copies); Hewlett Packard Personalized System Support Binder; Phone Instructions for Mayflower Hdg/Capital; Various Hewlett Packard Equip. Manuals (Toshiba Computer Manual and Windows 95 Manual)	Yes
T 104	Trustee					8/31/998	X					Credit Card Chargebacks; W9 Forms Plus Signature Page of Rep	Yes
T 105	Trustee					8/31/998	X					Printing Plus Vendor invoices	Yes
T 106	Trustee					8/31/998	X					Bankruptcy Notices (To be returned to Trustee)	Yes
T 109	Trustee					8/31/998	X					Bankruptcy Notices (To be returned to Trustee)	Yes
T 110	Trustee					8/31/998	X					5/98 Modified Comp. Plan; Spring 98 Bus. Journal; Bahamas Promo, Nicole Perry "no call" letters; Assoc. pins; Misc corres w/reps; Product catalogs.	Yes
T 111	Trustee					9/1/998	A					First Union [FUBN] Cancelled checks for "Printing Plus" 1994-96; To be returned to trustee - nonpert.	Yes
T 112	Trustee					9/21/998	X					Misc. expense reports 1998; Ken Rudd; Gary Rosen; Georgia Mollick; Robyn Land	Yes
T 113	Trustee					9/1/998	A					1998 vendor files; Invoices / Payments; Bahama, Carribean Hurricanes; John Brothers	Yes
T 114	Trustee					9/1/998	A					Vendor files; Jewels by Evonne, Nunez; Dodge Viper Giveaway; Mike Frey; Painting Plus	Yes
T 115	Trustee					9/1/998	A					Misc. expense reports 1998 - Mike Frey, John Brothers, Evonne Eckenroth; Jeff Hooks; Dawn McIntyre; Kevin Jones; Keith Mackay	Yes
T 116	Trustee					9/1/998	A					Vendor files - Mayflower Capital; Mayflower Holdings; Mayflower Aviation; Notes from M. Scott Frey re payments	Yes
T 117	Trustee					9/1/998	A					Misc. vendor files (1998); Derek Stryker; Stan Van Etten; account temps	Yes
T 118	Trustee					9/1/998	A					Misc. expense reports 1998 - Stephan Autrey; Jeff Hooks	Yes
T 119	Trustee					9/1/998	A					Misc. vendor files 1998 - List of IHI Paid cell phones and terminated employees. Memos between Alex Ravencraft and Freda George. BTI files.	Yes
T 120	Trustee					9/1/998	A					Misc. invoices; Robert Hukozalie, BTI, MC; Winn Capital. Agreement is private placement.	Yes
T 121	Trustee					9/1/998	A					Misc. expense reports - 1997; Alex Ravencraft; Cloris Reid; Ken Russ; Mike Russo; Omega Leasing; Anna Washburn; Sabrina Wei; Wood Francis	Yes
T 122	Trustee					9/1/998	A					Vendor files - 1998; UPS, FUNB, F-G, Y-Z	Yes
T 123	Trustee					9/1/998	A					6 books of Cambia Bank deposits [H] operating acct?; Misc. files; Soc. of State Raileg; SEC, Success Magazine, Travel Experts	Yes
T 124	Trustee					9/1/998	A					Misc. vendor files - mostly UPS US/Canada	Yes
T 125	Trustee					9/1/998	A					Check acceptance forms; credit card authorization forms	Yes

**IHI RECORDS / EVIDENCE INVENTORY**

BOX COLL.	BOX #	SOURCE	INFO. STORE #	ACCT NO.	DATE RECEIVED	ORIG.	COPY	DOC BEGIN	DOC END	AUTHOR FROM TO	ADRESSEE	DOC DATE	CONTENTS	JURY
														GRAND
T	126	Trustee	238	A	91456	9/21/99	X						Misc vendor files 1998: Ellers Jones Brown & McLeod; FedEx; D-F	Yes
T	127	Trustee	244	A	91456	9/21/99	X						Vendor files H-J 1998; Check to IHI from IHI; Jewels by Evonne	Yes
T	128	Trustee	236	A	91456	9/21/99	X						Misc. vendor files U-W	Yes
T	129	Trustee	234	A	91456	9/21/99	X						Misc. vendor files 1998 W-X	Yes
T	130	Trustee	233	A	91456	9/21/99	X						Misc. vendor files 1998 O-P; Printing Plus	Yes
T	131	Trustee											20/21 Mainframe Computer and related hardware	Yes

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	Int. Store Box #	STORE ACCT NO.	DATE RECEIVED	ORIG. COPY	DOC BEGIN	DOC END	AUTHOR FROM TO	ADDRESSEE	DOC DATE	CONTENTS	GRAND JURY
1	1	Info Stor	902 S	91456	1/21/00	X				A - CA Shareholder Info			
1	2	Info Stor	304		91456	1/21/00	X			Cashout Wk 1-11			
1	3	Info Stor	802	HR	91456	1/21/00	X			Terms 98 OctNov V - Z Active files & consultant personnel files			
1	4	Info Stor	216 A		91456	1/21/00	X			AP invoices (D-M) Mayflower folder included - handwritten note	Yes		
1	5	Info Stor	527 C		91456	1/21/00	X			Asian problem files			
1	6	Info Stor	15 A		91456	1/21/00	X			Autoship enrollment forms May-June 1998	Yes		
1	7	Info Stor	531 C		91456	1/21/00	X			Misc. Company Policies, Personnel files, Dr. King file, June monitor report			
1	8	Info Stor	502 C		91456	1/21/00	X			Legal issues - Small Claims Court			
1	9	Info Stor	218 A		91456	1/21/00	X			Controller's Desk (NM)			
1	10	Info Stor	523 C		91456	1/21/00	X			Monitor Files - Love Whitaker			
1	11	Info Stor	529 C		91456	1/21/00	X			Refund requests; Product returns (KBS)			
1	12	Info Stor	364 A		91456	1/21/00	X			Cancelled checks	Yes		
1	13	Info Stor	512 C		91456	1/21/00	X			Attorney General Cash Out correspondence by state			
1	14	Info Stor	909 S		91456	1/21/00	X			Sec. - WA shareholder info	Yes		
1	15	Info Stor	347 A		91456	1/21/00	X			Commission Checks - 1998	Yes		
1	16	Info Stor	213 A		91456	1/21/00	X			AP M-SH 1998			
1	17	Info Stor	516 C		91456	1/21/00	X			NCAG BBB NC reports			
1	18	Info Stor	204		91456	1/21/00	X			Rec. Forms J-M '97			
1	19	Info Stor	73		91911	1/21/00	X			Mayflower records labeled "Walnut Creek"			
1	20	Info Stor	78		81811	1/21/00	X			Mayflower records; G.U. records, Pyramid diagrams, 2021 proposal hr.			
1	21	Info Stor	3	1	91452	1/21/00	X			M. Russo 3/3/97			
1	22	Info Stor	354 A		91456	1/21/00	X			Canceled checks	Yes		
1	23	Info Stor	536 C		91456	1/21/00	X			AP + Ps. monitor correspondence dir financial info.			
1	24	Info Stor	907 S		91456	1/21/00	X			KC - MC Shareholder Info			
1	25	Info Stor	51		91456	1/21/00	X			Sales Representative Applications wk 39-98			
1	26	Info Stor	801 HR		91456	1/21/00	X			Terms 98 OctNov A .J			
1	27	Info Stor	818		91456	1/21/00	X			Bilateral moves			
1	28	Info Stor	800 HR		91456	1/21/00	X			Termination 1998 OctNov J-T			
1	29	Info Stor	1570 S		81805	4/1/00	X			Info Stor billing records, acct. history, records requests for IHL and MHI.			
1	30	Info Stor	201 A		91456	5/1/02	X			Includes request by Washburn 3/10/00;			
1	31	Info Stor	259 A		81456	5/1/02	X			Bank Acct. Info & Recs & Inventory			
1	32	Info Stor	280 A		91456	5/1/02	X			Banking, accounting & inventory reports for Chittenden #214538978 - voided checks, credit card, inventory; Centura #B2150608			
1	33	Info Stor	281 A		91456	5/1/02	X			Centura #B2143000 S records, Centura Overnight Investments, Handwritten notes on banking & checking matters (not ST/E), Black binder w/asset int. Printing Plus Usage Report - 1997, Accounting entries done by Info-Store on IHL, Bundle of canceled checks on Centura Bank 1997 & reports generated by Centura & faxed to IHL			
1	34	Info Stor	282 A		91456	5/1/02	X			Accounting documents - credit card posting, operating account deposits, / Centura & FUNIB;			
1	35	Info Stor	283 A		91456	5/1/02	X			Credit card search - credit requests Feb - April, 1998 Credit card posting April - July, 1998. Centura account #0212130505 wires January - June 1998. Daily bank report June 1998, vancou accounts, Operating account deposits, Centura #0212130505. First Union account #200001205391 deposits June - July 1998.			
1	36	Info Stor	285 A		91456	5/1/02	X			Centura Bank records - commission reconciliation, Account #0212130616 Chargeback notices, Chittenden, Nova Ullifield, SouthTrust	Yes		
1	37	Info Stor	286 A		91456	5/1/02	X			Nationsbank account recods 1997: Repurchase Agent Confirmations accts. #40231848 IHL, Analysis Statements accts. #40231848 IHL Stop Payments IMZ 1997 for NationsBank and Centura Bank, Bank Deposits Canada check register & list of deposits, NationsBank Banking Details - IHL bank summaries in back of box along w/ loose paper.	Yes		
1	38	Info Stor	288 A		91456	5/1/02	X			Bank accts info, Legal correspondence	Yes		
										Nations Bank Cancelled Checks & NB Files	Yes		

## IHL RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	INFO STATE	STORE BOX #	DATE RECEIVED	DOC# ACCT NO.	DATE ORIG COPY DOC BEGIN	DOC END	AUTHOR FROM TO	ADRESSEE	DOC DATE	CONTENTS	GRAND JURY
										South Trust Bank, Canadian Bank into, Hong Kong Bank of Canada, General IHL - Canada Info, Canada acct records, journal entries, U.S. acct records, journal entries, Payables Info, Commissions Info, Lease Info, SouthTrust Bank Info (CD), Canadian Bank into Hong Kong Bank of Canada			
	39	Info Stor	274	A	91456	5/1/02	X			GL Records			
	40	Info Stor	275	A	91456	5/1/02	X			Validated Checks/Misc. A/P Info			
	41	Info Stor	281	A	91456	5/1/02	X			Centura check copies 1992-3 - 21250 Disbursements Account			
	42	Info Stor	283	A	91456	5/1/02	X			#053100850 02/12/30/95	Yes		
	43	Info Stor	319	A	91456	5/1/02	X	X		Centura Check Copies (19 5/3-21, 250)			
	44	Info Stor	321	A	91456	5/1/02	X	X		Centura check copies 21, 251-22, 490			
	45	Info Stor	327	A	91456	5/1/02	X			Centura check copies 1997 - IHL disbursement account Checks #12943, 17182.	Yes		
	46	Info Stor	339	A	91456	5/1/02	X			Centura OK copies			
	47	Info Stor	337	A	91456	5/1/02	X			Accounting Check Copies			
	48	Info Stor	349	A	91456	5/1/02	X			Centura Check Copies			
	49	Info Stor	350	A	91456	5/1/02	X			Centura Commissions			
	50	Info Stor	356	A	91456	5/1/02	X			1995 Scanned Applications M-Me-S1	Yes		
	51	Info Stor	1	A	91456	9/1/02				Auto ship enrollment forms March 98			
	52	Info Stor	1	A	91456	9/1/02				1995 scanned applications A-F	Yes		
	53	Info Stor	3	A	91456	9/1/02				CPC1 H1 7/15-7/20/95 All Types			
	54	Info Stor	3	A	91456	9/1/02				1995 Scanned Applications SJ-Z			
	55	Info Stor	4	A	91456	9/1/02				1996 Scanned Applications M-Me-S1	Yes		
	56	Info Stor	4	A	91456	9/1/02				Applications 5/98			
	57	Info Stor	5	A	91456	9/1/02				1996 Scanned Applications Vol Wk 9-12			
	58	Info Stor	5	A	91456	9/1/02				Applications 5/98			
	59	Info Stor	6	A	91456	9/1/02				1998 Scanned Applications Volume Week 13-15			
	60	Info Stor	6	A	91456	9/1/02				WK 12 Apps			
	61	Info Stor	7	A	91456	9/1/02				1998 Scanned Applications Volume Week 16-18			
	62	Info Stor	7	A	91456	9/1/02				Applications 6/98			
	63	Info Stor	8	A	91456	9/1/02				1998 Scanned Applications Volume Week 19-22			
	64	Info Stor	8	A	91456	9/1/02				CPC - Applications 7/98			
	65	Info Stor	9	A	91456	9/1/02				1998 Scanned Applications Volume Week 23-27			
	66	Info Stor	9	A	91456	9/1/02				CPC1 H1 8/18 - 6/30/98 All P&V			
	67	Info Stor	10	A	91456	9/1/02				Customer Services Autoship Mar '98			
	68	Info Stor	11	A	91456	9/1/02				CPC - Applications 3/98			
	69	Info Stor	12	A	91456	9/1/02				RBA WK 2-7			
	70	Info Stor	12	A	91456	9/1/02				Sales Apps Orders 3/98			
	71	Info Stor	13	A	91456	9/1/02				RBA WK 6-10			
	72	Info Stor	13	A	91456	9/1/02				MA WS 5/98 Apps			
	73	Info Stor	14	A	91456	9/1/02				RBA WK 11-12			
	74	Info Stor	14	A	91456	9/1/02				Cust Services Autoship enrollment forms			
	75	Info Stor	15	A	91456	9/1/02				Yes			
	76	Info Stor	16	A	91456	9/1/02				RBA WK 13-14			
	77	Info Stor	17	A	91456	9/1/02				RBA WK 15-18			
	78	Info Stor	17	A	91456	9/1/02				RBA WK 17-18 '98			
	79	Info Stor	18	A	91456	9/1/02				April Apps '98			
	80	Info Stor	19	A	91456	9/1/02				RBA WK 18-20 '98			
	81	Info Stor	19	A	91456	9/1/02				RBA WK 21-22 '98			
	82	Info Stor	20	A	91456	9/1/02				Customer Services Autoship enrollment forms (April, 1998)	Yes		
	83	Info Stor	20	A	91456	9/1/02				CPC '98 WK 13 Apps '98			
	84	Info Stor	21	A	91456	9/1/02				BTI 3/16-7/20/98 A-H			
	85	Info Stor	23	A	91456	9/1/02				RBA WK 25-28			
	86	Info Stor	23	A	91456	9/1/02				App WK 28-30			
	87	Info Stor	24	A	91456	9/1/02				CPC '98 WK 13 Apps '98			
	88	Info Stor	24	A	91456	9/1/02				RBA WK 27-28 '98			
	89	Info Stor	25	A	91456	9/1/02				Autoship forms NC and MI apps			
	90	Info Stor	26	A	91456	9/1/02				RBA WK 28-30 '98			
	91	Info Stor	27	A	91456	9/1/02				RBA WK 31-32 '98			
	92	Info Stor	28	A	91456	9/1/02				App WK 31-32 '98			
	93	Info Stor	29	A	91456	9/1/02				App WK 33-34 '98			
	94	Info Stor	30	A	91456	9/1/02				RBA WK 33-34 '98			
										App WK 35-38 '98			

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	INFO STATE	IS/PORE	DATE RECEIVED	ORIG.	COPY	DOC BEGIN	DOC END	AUTHOR FROM TO	ADDRESSEE	DOC DATE	CONTING.	GRAND TOTAL
-	95	Info Stor	31		91455						RBA WK 36-39 96			
-	96	Info Stor	32		91455						RBA WK 37-38 96			
-	97	Info Stor	33		91455						APP/REA WK 36-39 96			
-	98	Info Stor	34		91455						APP/REA WK 37-38 96			
-	99	Info Stor	35		91455						Rec Forms 96			
-	100	Info Stor	36		91455						Rec Forms 96			
-	101	Info Stor	37		91455						Cashouts A-M 95			
-	102	Info Stor	38		91455						Cashouts M-Z 95			
-	103	Info Stor	39		91455						Cashouts A-D J-M 96			
-	104	Info Stor	40		91455						Cashouts E-K J-M 96			
-	105	Info Stor	42		91455						Cashouts Jan - March 1996 (S-Z)			
-	106	Info Stor	43		91455						Cashouts '96			
-	107	Info Stor	44		91455						Cashouts WK 20-31 1996 (Returns to reps)			
-	108	Info Stor	45		91455						Prod Order Form 96			
-	109	Info Stor	46		91455						Rec Forms			
-	110	Info Stor	47		91455						App WK 36			
-	111	Info Stor	48		91455						RBA WK 36			
-	112	Info Stor	49		91455						RBA WK 36			
-	113	Info Stor	50		91455						RBA WK 36			
-	114	Info Stor	52		91455						RBA WK 39			
-	115	Info Stor	53		91455						96 RBA's to be filed O			
-	116	Info Stor	54		91455						RBA's to be filed/scanned			
-	117	Info Stor	58		91455						Week 20-31 (S) App/REA/WK			
-	118	Info Stor	59		91455						Week 20-31 (S) B-1-15			
-	119	Info Stor	60		91455						RBA 95			
-	120	Info Stor	61		91455						RBA 95-96			
-	121	Info Stor	62		91455						RBA 95			
-	122	Info Stor	63		91455						Cashouts '95			
-	123	Info Stor	64		91455						Check Accept 96			
-	124	Info Stor	65		91455						Appes WK 40-41 S			
-	125	Info Stor	66		91455						Appes WK 42-43 S			
-	126	Info Stor	67		91455						Appes WK 44-46 S			
-	127	Info Stor	68		91455						Rec Form 96			
-	128	Info Stor	70		91455						Check Accept 96			
-	129	Info Stor	71		91455						CO WK 0-23 96			
-	130	Info Stor	72		91455						CO WK 24-36			
-	131	Info Stor	73		91455						CO WK 25-27 96			
-	132	Info Stor	74		91455						CO WK 28-36			
-	133	Info Stor	75		91455						CO WK 28-34 96			
-	134	Info Stor	76		91455						CO WK 35-39 96			
-	135	Info Stor	77		91455						CO WK 40-45 96			
-	136	Info Stor	78		91455						CO WK 5A, Check 96			
-	137	Info Stor	79		91455						W-9 98			
-	138	Info Stor	80		91455						W-9 A-B 96			
-	139	Info Stor	81		91455						W-9 B-C 96			
-	140	Info Stor	83		91455						W-9 E-F 96			
-	141	Info Stor	86		91455						W-9 G-H 96			
-	142	Info Stor	87		91455						W-9 H-J 96			
-	143	Info Stor	89		91455						W-9 J-L 96			
-	144	Info Stor	91		91455						W-9 L-M 96			
-	145	Info Stor	92		91455						W-9 M-N 96			
-	146	Info Stor	94		91455						W-9 O-R 96			
-	147	Info Stor	97		91455						W-9 R-S 96			
-	148	Info Stor	A		91455						App. Voi/Wk 8-14			
-	149	Info Stor	98		91455						W-9 S-T 96			
-	150	Info Stor	99		91455						W-9 T-W 96			
-	151	Info Stor	102		91455						W-9 W-Z D 96			
-	152	Info Stor	103		91455						Cash Outs			
-	153	Info Stor	104		91455						Cash Outs			
-	154	Info Stor	105		91455						Cash Outs			
-	155	Info Stor	106		91455						Cash Outs			
-	156	Info Stor	107		91455						Cash Outs			

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	INFO BOX #	STORE ACTN NO.	DATE RECEIVED	DUE DATE	ADDRESS TO	DESCRIPTION	GRAND TOTAL
-	157	Info Stor	108	91456				Cash Out	
-	158	Info Stor	110	91456				Wk 9/96	
-	159	Info Stor	111	91456				Rec Forms 96	
-	160	Info Stor	112	91456				Rec Forms 96	
-	161	Info Stor	113	91456				Winter Promo Dec 98	
-	162	Info Stor	114	91456				RBA 40-41 98 O	
-	163	Info Stor	115	91456				RBA 42-43 98 O	
-	164	Info Stor	116	91456				RBA 44 98 O	
-	165	Info Stor	117	91456				RBA 46 98 O	
-	166	Info Stor	118	91456				RBA 48 98 O and 95, forms to transfer business to other rep	
-	167	Info Stor	119	91456				Apps 37-38 98 O	
-	168	Info Stor	120	91456				Apps 46 96 O	
-	169	Info Stor	121	91456				Apps 47 98 O	
-	170	Info Stor	124	91456				Bonus 98	
-	171	Info Stor	125	91456				Bonus 98	
-	172	Info Stor	126	91456				Bonus 95	
-	173	Info Stor	127	91456				97 Misc Paperwork/No Apps	
-	174	Info Stor	128	91456				Week 18/97 RBAs and apps	
-	175	Info Stor	129	91456				Week 17/97	
-	176	Info Stor	130	91456				Week 18/97 (S) RBAs and apps	
-	177	Info Stor	131	91456				Week 19/97 (S) RBAs and CC forms	
-	178	Info Stor	132	91456				Week 18/97 (S) B1-20 RBAs and apps	
-	179	Info Stor	133	91456				Week 18/97 (S) B30-63 deposits	
-	180	Info Stor	134	91456				Week 19/97 (S)	
-	181	Info Stor	135	91456				(S) RBAs 97	
-	182	Info Stor	137	91456				Week J-M 97 RBAs	
-	183	Info Stor	138	91456				Week 18/97 (S) B1-11 Apps and RBAs	
-	184	Info Stor	139	91456				Week 18/97 (S) B12-21 Apps and RBAs	
-	185	Info Stor	140	91456				Week 18/97 (S) B22- Apps and RBAs	
-	186	Info Stor	141	91456				Week 22/97 (S) Misc Papers (No Apps/RBAs) Receipts, Check acceptance forms	
-	187	Info Stor	142	91456				98 check acceptance forms	
-	188	Info Stor	143	91456				Check Acceptance forms 97	
-	189	Info Stor	144	91456				Winter Promo 97, Apps, summer product promo 96	
-	190	Info Stor	145	91456				Winter Promo 97	
-	191	Info Stor	146	91456				Winter Promo 98	
-	192	Info Stor	147	91456				Winter Promo 97, check acceptance forms	
-	193	Info Stor	148	91456				Sales Orders 98-97, forms and receipts	
-	194	Info Stor	149	91456				Sales Orders 98-97, misc forms	
-	195	Info Stor	150	91456				Rec. Forms 98-97	
-	196	Info Stor	151	91456				Rec. Forms 98-97 Wk 96 97	
-	197	Info Stor	152	91456				Rec. Forms 98	
-	198	Info Stor	153	91456				Cashouts Wks 48-50 96 credit request	
-	199	Info Stor	154	91456				Cashouts Wks 50-52 96	
-	200	Info Stor	155	91456				Cashouts Wks 1-3 97	
-	201	Info Stor	156	91456				Cashouts Wks 4-8 97	
-	202	Info Stor	157	91456				Cashout Authorization 9/29/11/, credit card authorizations, cash transactions	
-	203	Info Stor	158	91456				Bonus Reg. Wk 1-24 CC log	
-	204	Info Stor	159	91456				CC Reg May 98-Oct 98	
-	205	Info Stor	160	91456				Misc. Destroy - corresp from reps, check acceptance forms, receipts W-	
-	206	Info Stor	161	91456				98	
-	207	Info Stor	162	91456				Misc. Destroy - downlines corresp from reps	
-	208	Info Stor	163	91456				Apps. 97 Wk 3-5 (S)	
-	209	Info Stor	164	91456				Apps. 97 Wk 3-5 (S)	
-	210	Info Stor	165	91456				Apps. 97 Wk 5-7 (S)	
-	211	Info Stor	166	91456				Apps. 96 Wk 41-50 (S)	
-	212	Info Stor	167	91456				Apps. 96 Wk 43-45 (S)	
-	213	Info Stor	168	91456				Apps. 96 Wk 46-48 W. 9/6 98	
-	214	Info Stor	169	91456				Apps. 96 Wk 48-51 (S)	
-	215	Info Stor	170	91456				W/98	

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	INC. STOR	IS/CORE STOR	DATE RECEIVED	DOC. CODE	DATE	ADDRESSEE	DOC DATE	CONSIDER	GRAND JURY
					91465						
-	216	Info Stor	171		91465						
-	217	Info Stor	172		91465						
-	218	Info Stor	173		91465						
-	219	Info Stor	175		91465						
-	220	Info Stor	176		91465						
-	221	Info Stor	177		91465						
-	222	Info Stor	178		91465						
-	223	Info Stor	179		91465						
-	224	Info Stor	180		91465						
-	225	Info Stor	181		91465						
-	226	Info Stor	182		91465						
-	227	Info Stor	183		91465						
-	228	Info Stor	184		91465						
-	229	Info Stor	185		91465						
-	230	Info Stor	187		91465						
-	231	Info Stor	188		91465						
-	232	Info Stor	189		91465						
-	233	Info Stor	191		91465						
-	234	Info Stor	192		91465						
-	235	Info Stor	183		91465						
-	236	Info Stor	194		91465						
-	237	Info Stor	195		91465						
-	238	Info Stor	196		91465						
-	239	Info Stor	197		91465						
-	240	Info Stor	198		91465						
-	241	Info Stor	200		91465						
-	242	Info Stor	202		91465						
-	243	Info Stor	203		91465						
-	244	Info Stor	205	A	91455						
-	245	Info Stor	206	A	91455						
-	246	Info Stor	206	A	91455						
-	247	Info Stor	207		91455						
-	248	Info Stor	208		91455						
-	249	Info Stor	208	A	91455						
-	250	Info Stor	208	A	91455						
-	251	Info Stor	209		91455						
-	252	Info Stor	209	A	91455						
-	253	Info Stor	210		91455						
-	254	Info Stor	210	A	91455						
-	255	Info Stor	211		91455						
-	256	Info Stor	212		91455						
-	257	Info Stor	213		91455						
-	258	Info Stor	214	A	91455						
-	259	Info Stor	215		91455						
-	260	Info Stor	215	A	91455						
-	261	Info Stor	215	A	91455						
-	262	Info Stor	216		91455						
-	263	Info Stor	217	A	91455						
-	264	Info Stor	218		91455						
-	265	Info Stor	219		91455						
-	266	Info Stor	219	A	91455						
-	267	Info Stor	220		91455						
-	268	Info Stor	220	A	91455						
-	269	Info Stor	221		91455						
-	270	Info Stor	221	A	91455						
-	271	Info Stor	222		91455						
-	272	Info Stor	222	A	91455						
-	273	Info Stor	223	A	91455						
-	274	Info Stor	224	A	91455						
-	275	Info Stor	224	A	91455						
-	276	Info Stor	225		91455						

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	STORE	DATE RECEIVED	DOC DATE	ADDRESS	GRAND JURY	
			State	Box #	ACTN#	DOC BEGIN	DOC END	AUTHOR FROM IQ
-	277	Info Stor	225	A	91455			Controllers Desk (NIN)
-	278	Info Stor	226	A	91455			Wk 9 J-M 987 M-O
-	279	Info Stor	226	A	91455			Controllers Desk, Manuals, rescission letters re WA state IHI stock awards, stock correspondence
-	280	Info Stor	227	A	91455			Sales Tax info
-	281	Info Stor	228		91455			Wk 9 J-M 97 F-I
-	282	Info Stor	228	A	91455			Sales Tax
-	283	Info Stor	228		91455			Wk 9 J-M 97 C-F
-	284	Info Stor	229	A	91455			Sales Tax Returns A-M
-	285	Info Stor	230	A	91455			Wk 9 A-C
-	286	Info Stor	230	A	91455			Sales Tax/Vetax/Quanton Manuals
-	287	Info Stor	231		91455			Sales Receipts 97-J-M
-	288	Info Stor	231	A	91455			Sales Tax Manuals
-	289	Info Stor	232	A	91455			Spring Promotion '97 J-M
-	290	Info Stor	232		91455			Sales Tax Returns N-Z
-	291	Info Stor	233		91455			Check Acceptance 97 J-M
-	292	Info Stor	234		91455			Scanned Applications 97 Wk 10-14
-	293	Info Stor	235		91455			Scanned Applications 97 Wk 12
-	294	Info Stor	236		91455			Scanned RBA's 97 13-14,15
-	295	Info Stor	237		91455			Scanned batches 97 Wk 10
-	296	Info Stor	238		91455			Scanned App/RBA's 97 Wk 17-B-122
-	297	Info Stor	239		91455			Spring Promo Forms J-M 1987
-	298	Info Stor	241		91455			Sales Rec. Forms J-M 1987
-	299	Info Stor	242		91455			Wk 16 Scanned
-	300	Info Stor	243		91455			Sales Aid Forms (J-M 97)
-	301	Info Stor	245		91455			Wk 14 (S)
-	302	Info Stor	245	A	91455			Vendor invoices Bullova, Cell One, PCUS
-	303	Info Stor	246		91455			Credit Authorization Forms 97
-	304	Info Stor	246	A	91455			Payroll + journals
-	305	Info Stor	247	A	91455			Vol. Trans. B-M 95-96
-	306	Info Stor	247		91455			Payroll (T/S, Journal, Forms)
-	307	Info Stor	248	A	91455			Vol. Trans A,B,L,P 95-96 (transfer apps)
-	308	Info Stor	248		91455			Payroll / Quarterly reports 1988 - 98
-	309	Info Stor	249		91455			Vol. Trans. R-2 95-98
-	310	Info Stor	249	A	91455			Payroll
-	311	Info Stor	250		91455			RBA 1988 (S)
-	312	Info Stor	250	A	91455			Payroll
-	313	Info Stor	251		91455			Wk 18 (S) B 17-28
-	314	Info Stor	251	A	91455			Payroll
-	315	Info Stor	252		91455			Wk 17 (S) B 17-52
-	316	Info Stor	252	A	91455			Payroll Quarterly Reports
-	317	Info Stor	253		91455			Wk 17 (S) B 1-14
-	318	Info Stor	253	A	91455			Payroll, book royalty info
-	319	Info Stor	254		91455			Payroll and employee files, performance reports
-	320	Info Stor	255	A	91455			Wk 9 1987 G-J
-	321	Info Stor	255		91455			Payroll (S/E)
-	322	Info Stor	256		91455			Wk 9 1987 H-Q
-	323	Info Stor	256	A	91455			Payroll
-	324	Info Stor	257		91455			Wk 9 1987 C-F
-	325	Info Stor	257	A	91455			Bank accnt Info, FUNB, Centurie, Daily activity reports Mechanic card statements
-	326	Info Stor	258		91455			Yes
-	327	Info Stor	258	A	91455			Wk 9 1987 R-T
-	328	Info Stor	259		91455			Wk 9 T-Z
-	329	Info Stor	260		91455			Wk 9 Forms 1987 A-B
-	330	Info Stor	261		91455			Yes
-	331	Info Stor	262		91455			Week 21/97 (S) B 1-25
-	332	Info Stor	263		91455			Week 21/97 (S) B 21-35
-	333	Info Stor	264	A	91455			CC servers documentation, account complaints (Chittenden, Nov, United)
-	334	Info Stor	266		91455			Wk 23 Check and Credit Auth.
-	335	Info Stor	267		91455			Yes
-								Wk 23 Rec Forms

IM RECORDS / EVIDENCE INVENTORY

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	ITEM NO.	STORE STATE	ACCT NO.	RECEIVED	DATE RECEIVED	ORG.	COPY	DOC BEGIN	DOC END	AUTHOR FROM TO	APPROVING SIGNATURE	DOC DATE	CONTINUATION	GRAND JURY	
																GRAND JURY	
1	395	Info Stor	504	A	91456												1069 Files
1	396	Info Stor	505		91456												Cashout Wk 12-14
1	397	Info Stor	506		91456												Cashout Wk 15-17
1	398	Info Stor	506	A	91456												POS Credit Card chargebacks & posting July, Aug, Sept 1997
1	399	Info Stor	507		91456												Cashout Wk 18-19
1	400	Info Stor	508		91456												Cashout Wk 20-21
1	401	Info Stor	508	A	91456												Training Manual
1	402	Info Stor	509		91456												Cashout Wk 22-23
1	403	Info Stor	509	A	91456												Vendor invoices J.B.E. & J.Klaugh
1	404	Info Stor	310	A	91456												Cashout Wk 24
1	405	Info Stor	310		91456												EB Harvey invoices
1	406	Info Stor	311	A	91456												Cashout Wk 25-28
1	407	Info Stor	311		91456												Centura Bank checks 1995 17/70-19519
1	408	Info Stor	312		91456												Cashout Wk 27-29
1	409	Info Stor	312	A	91456												UPS invoices
1	410	Info Stor	313		91456												Cashout Wk 30-32
1	411	Info Stor	313	A	91456												MCI invoices
1	412	Info Stor	314		91456												Cashout Wk 33-36
1	413	Info Stor	314	A	91456												POS Credit Card chargebacks & posting Jan - Feb 98
1	414	Info Stor	315	A	91456												Cashout Georgia
1	415	Info Stor	315		91456												1995 Checks
1	416	Info Stor	316		91456												O-S-W-G Certified Letter
1	417	Info Stor	317	A	91456												A-C W-G Certified Letter
1	418	Info Stor	317		91456												POS Credit Card Charge backs/Posting Mar-Apr May 98
1	419	Info Stor	318		91456												D-G W-G Certified Letter
1	420	Info Stor	318	A	91456												Nations Bank Cancelled Checks
1	421	Info Stor	319		91456												S-Z W-G Certified Letter
1	422	Info Stor	320		91456												RBA Wk 37-38
1	423	Info Stor	320	A	91456												POS CC Charge Backs/ Posting Feb 1998
1	424	Info Stor	321		91456												H-K W-G Certified Letters
1	425	Info Stor	322		91456												Sales Posting Journals
1	426	Info Stor	322	A	91456												Employee Exp. Reports 1998
1	427	Info Stor	323		91456												Volume Ads
1	428	Info Stor	323	A	91456												Credit card charges and changebank reports Oct - Dec 97
1	429	Info Stor	324		91456												Sales posting journal
1	430	Info Stor	324	A	91456												Rep CK requests
1	431	Info Stor	325		91456												W-S & Certified letters G-L
1	432	Info Stor	325	A	91456												POS CC Charge Backs/ Posting Oct, Nov, Dec 97
1	433	Info Stor	326		91456												W-S & Certified letters M-S
1	434	Info Stor	326	A	91456												Misc. files, directories, research
1	435	Info Stor	327		91456												W-S & Certified letters T-Z
1	436	Info Stor	328		91456												W-S & Certified letters A-F
1	437	Info Stor	328	A	91456												Dinnoch Hill Invoices 9/97 - 2/98
1	438	Info Stor	328		91456												WK 31 Orders
1	439	Info Stor	330	A	91456												WK 31 Apps
1	440	Info Stor	330		91456												FU Checks 7/98
1	441	Info Stor	331		91456												WK 31 Misc
1	442	Info Stor	331	A	91456												Nations Bank OK Copies + Void CKs
1	443	Info Stor	332		91456												KW33 Orders
1	444	Info Stor	332	A	91456												UPS invoices
1	445	Info Stor	333		91456												WK 33 Apps
1	446	Info Stor	333	A	91456												Merchant account (Chittenden) travel agency
1	447	Info Stor	334		91456												Rep CK Rec Sept & Oct
1	448	Info Stor	335		91456												Transfers W-Z
1	449	Info Stor	335	A	91456												Nations Bank Check Copiers
1	450	Info Stor	336		91456												Transfers M-W
1	451	Info Stor	337		91456												Transfers A-K
1	452	Info Stor	338		91456												WK 33 Misc
1	453	Info Stor	338	A	91456												Vendor invoices - GTE EBH Celcom P.P.
1	454	Info Stor	339		91456												WK 32 Misc
1	455	Info Stor	339	A	91456												B/T/INN 9/97-10/97
1	456	Info Stor	340		91456												WK 33 Apps

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	STORE	DATE RECEIVED	DUE DATE	ADDRESS	DOCUMENT	GRAND JURY
1	457	Info Stor	341	A	91456			WK 4/97 - 7-97
1	459	Info Stor	341	A	91456			UPS invoices (Custom House 86)
1	460	Info Stor	342	A	91456			WK 34 Apps
1	461	Info Stor	343	A	91456			New Orleans Annual Convention
1	462	Info Stor	343	A	91456			WK 34 Orders
1	463	Info Stor	343	A	91456			Batch Settled Orders
1	464	Info Stor	344	A	91456			WK 34 Misc. retail receipt forms
1	465	Info Stor	344	A	91456			Credit card rec
1	466	Info Stor	345	A	91456			W-9 & Certified Letters A - L
1	467	Info Stor	345	A	91456			PPC Manuals
1	468	Info Stor	346	A	91456			W-9 & Certified Letters M - Z
1	469	Info Stor	346	A	91456			Commission Checks - 1995, misc was scanned
1	470	Info Stor	347	A	91456			Misc was scanned, applications
1	471	Info Stor	348	A	91456			Misc was misc. retail receipt forms
1	472	Info Stor	348	A	91456			Centura 97 / Southtrust 96
1	473	Info Stor	349	A	91456			Development/Cert W-9
1	474	Info Stor	351	A	91456			Sales Aids
1	475	Info Stor	351	A	91456			Centura Bank Deposits
1	476	Info Stor	352	A	91456			WK 38 Misc 1997
1	477	Info Stor	352	A	91456			NB Oper. Acct. Dep. Jul - Oct 95 Southtrust 1995 BC Deposit
1	478	Info Stor	353	A	91456			WK 36 Apps 1997
1	479	Info Stor	354	A	91456			WK 36 Orders 1997
1	480	Info Stor	355	A	91456			WK 37 Misc 1997
1	481	Info Stor	356	A	91456			WK 37 Misc 1997
1	482	Info Stor	357	A	91456			WK 38 Misc 1997
1	483	Info Stor	357	A	91456			Disbursements
1	484	Info Stor	358	A	91456			WK 39 Misc 1997
1	485	Info Stor	358	A	91456			Operating
1	486	Info Stor	359	A	91456			W-9 & Cert Ltrs WK 3D-4/7-97
1	487	Info Stor	359	A	91456			checks
1	488	Info Stor	360	A	91456			Commissions 9/93-1/2/96
1	489	Info Stor	361	A	91456			WK 35 Orders
1	490	Info Stor	361	A	91456			Commissions 3/1/97 - 3/21/97
1	491	Info Stor	362	A	91456			W-9 & Cert Ltrs WK A - G 97
1	492	Info Stor	362	A	91456			Disbursements Centura 1/97
1	493	Info Stor	363	A	91456			Sales Aids 97
1	494	Info Stor	363	A	91456			Disbursements 6/97 - 11/1/97
1	495	Info Stor	364	A	91456			WK 35 Apps
1	496	Info Stor	365	A	91456			WK 32 Misc.
1	497	Info Stor	365	A	91456			Cancelled checks
1	498	Info Stor	366	A	91456			DC 97
1	499	Info Stor	366	A	91456			Cancelled checks
1	500	Info Stor	367	A	91456			WK 35 Misc
1	501	Info Stor	367	A	91456			Commissions 3/21/97 - 4/1/97, canceled checks
1	502	Info Stor	368	A	91456			W-9 & Cert. Ltrs. 97
1	503	Info Stor	368	A	91456			Commissions Feb and March 97, canceled checks
1	504	Info Stor	369	A	91456			W-9 & Cert. Ltrs. 97
1	505	Info Stor	369	A	91456			Canceled checks
1	506	Info Stor	370	A	91456			DC/Wk 27-4/3
1	507	Info Stor	370	A	91456			Acct. Ch. Copies
1	511	Info Stor	374					W-9 & Cert. Ltrs. A - T
1	512	Info Stor	374					Accting Ch. Copies
1	513	Info Stor	376					WK 35 RBA
1	514	Info Stor	377					WK 38-39 Prod Orders Scanned 9/97
1	515	Info Stor	378					CO Weeks 3/1-37
1	516	Info Stor	379					CO Weeks 37-39
1	517	Info Stor	380					CO Weeks 40-43
1	518	Info Stor	381					CO Weeks 44-47

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	LINE STATE	STORE BOX #	ACCT NO.	DATE RECEIVED	DATE	ADDRESS	DOC DATE	CONTENTS	GRAND
											JULY
	519	Info Stor	382		91455					WK #2 Product Orders	
	520	Info Stor	383		91455					WK #2 RBA, 1998	
	521	Info Stor	384		91455					WK #38 Receipt	
	522	Info Stor	385		91455					WK #38 Receipt	
	523	Info Stor	388		91455					WK #1 Receipt	
	524	Info Stor	389		91455					WK #37 App	
	525	Info Stor	390		91455					WK #2 W-9's	
	526	Info Stor	391		91455					WK #1 W-9's	
	527	Info Stor	392		91455					WK #1 W-9's	
	528	Info Stor	393		91455					WK #2 Volume	
	529	Info Stor	394		91455					WK #1 RBA	
	530	Info Stor	395		91455					WK #1 Apps	
	531	Info Stor	396		91455					WK #38-39 Orders	
	532	Info Stor	397		91455					WK #1 Orders	
	533	Info Stor	398		91455					WK #39 Apps	
	534	Info Stor	399		91455					WK #35-38 Receipt	
	535	Info Stor	400		91455					WK #5 W-9's, rep agreements	
	536	Info Stor	401		91455					WK #4 Volume transfer/sale request forms	
	537	Info Stor	402		91455					WK #5 Volume transfer/sale request forms, medical records	
	538	Info Stor	403		91455					WK #3 Apps Jan 98	
	539	Info Stor	404		91455					WK #44 Receipt	
	540	Info Stor	405		91455					WK #45 RBA Nov 97	
	541	Info Stor	406		91455					WK #46 RBA Nov 97	
	542	Info Stor	407		91455					WK #45 RBA Nov 97	
	543	Info Stor	408		91455					WK #5 Apps Jan 98	
	544	Info Stor	409		91455					WK #4 Apps Oct 97	
	545	Info Stor	410		91455					WK #4 Products Orders Jan '98	
	546	Info Stor	411		91455					WK #46 Apps Nov 97	
	547	Info Stor	413		91455					WK #47 Apps Nov 97	
	548	Info Stor	415		91455					WK #44 RBA Oct/Nov 97	
	549	Info Stor	416		91455					WK #43 W-9's, rep agmts	
	550	Info Stor	417		91455					WK #43 RBA Jan 98	
	551	Info Stor	418		91455					WK #3 Receipt forms Feb '98	
	552	Info Stor	419		91455					WK #40 Apps Oct 97	
	553	Info Stor	420		91455					WK #45 Apps	
	554	Info Stor	421		91455					WK #43 RBA Oct 97	
	555	Info Stor	422		91455					WK #5 Receipt forms Feb '98	
	556	Info Stor	423		91455					WK #4 W-9's, rep agmts	
	557	Info Stor	425		91455					WK #40 Apps Oct 97	
	558	Info Stor	426		91455					WK #4 Receipt forms Jan '98	
	559	Info Stor	427		91455					WK #4 Apps Jan 98	
	560	Info Stor	428		91455					WK #5 RBA Jan/Feb 98	
	561	Info Stor	429		91455					WK #37 Apps Sep 97	
	562	Info Stor	430		91455					WK #4 Apps Oct/Nov 97	
	563	Info Stor	431		91455					WK Transfers	
	564	Info Stor	432		91455					M - V Transfers	
	565	Info Stor	433		91455					G - M Transfers	
	566	Info Stor	434		91455					A - G Transfers	
	567	Info Stor	435		91455					C O Wks 41-52 97	
	568	Info Stor	436		91455					CO Wks 53-62 97	
	569	Info Stor	438		91455					WK 48 RBA's Nov 97	
	570	Info Stor	439		91455					WK #43 Receipt forms, rep app Oct 97	
	571	Info Stor	440		91455					WK #41 Receipt Oct/Nov 97	
	572	Info Stor	441		91455					40-45 Orders, forms Oct 97	
	573	Info Stor	442		91455					WK 42 Apps Oct 97	
	574	Info Stor	443		91455					WK 41 RBA's Oct 97	
	575	Info Stor	444		91455					WK 36,39,37 Apps Sep 97	
	576	Info Stor	445		91455					WK 37,38,39 RBA's Sep 97	
	577	Info Stor	446		91455					WK 40 RBA's Sep/Oct 97	
	578	Info Stor	447		91455					WK 42 Apps Oct 97	
	579	Info Stor	448		91455					WK 45,6,7 W-9's rep agmts	
	580	Info Stor	449		91455					WK 5,6 Apps prod promo forms, Jan/Feb 98	

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	STORE		DATE RECEIVED	ADRESSEE	DOC DATE	CONTENTS	GRAND JURY
			Store	Box #					
	581	Info Stor	450		91456			Sale Ales order forms 87-98	
	582	Info Stor	451		91456			Wk 42 RBA & Oct 97	
	583	Info Stor	452		91456			Wk 45 Apps New/Dec 97	
	584	Info Stor	453		91456			Misc Wks RBA's Jan 98	
	585	Info Stor	454		91456			Wk #39-49 50 RBA Sep-Dec 97	
	586	Info Stor	455		91456			Wk #4-4+5 RBA Wk#5 Jan 98	
	587	Info Stor	455		91456			Wk #5 Apps Dec 97	
	588	Info Stor	457		91456			Wk #39 Orders Sep/Dec 97	
	589	Info Stor	459		91456			Wk #40-41 Apps Oct 97	
	590	Info Stor	460		91456			AutoShip enrollment forms	
	591	Info Stor	461		91456			Wk #46 M RBA Feb 98	
	592	Info Stor	462		91456			Wk #45 Apps Feb 98	
	593	Info Stor	463		91456			Wk #50-51 Apps Feb 98	
	594	Info Stor	464		91456			Wk #50-51 Apps Dec 97	
	595	Info Stor	465		91456			Wk #48 RBA Feb 98	
	596	Info Stor	466		91456			Wk #48 Apps Feb 98	
	597	Info Stor	467		91456			Wk #49 RBA Mar 98	
	598	Info Stor	468		91456			Wk #49 Apps, forms Fischer 98	
	599	Info Stor	469		91456			Wk #47 RBA Feb 98	
	600	Info Stor	470		91456			Wk #47 RBA New/Dec 97	
	601	Info Stor	471		91456			Wk #48-49 Misc. wk. RBA's order forms, rep apps	
	602	Info Stor	472		91456			Wk #10 RBA's Mar 98	
	603	Info Stor	474		91456			Wk #7 Apps Feb 98	
	604	Info Stor	475		91456			Wk #7 RBA Feb 98	
	605	Info Stor	476		91456			Wk #7 RBA Dec 97	
	606	Info Stor	477		91456			Wk #8-9 RBA Dec 97	
	607	Info Stor	478		91456			Wk #13 Apps Oct 97	
	608	Info Stor	479		91456			Wk #44-45 Apps, CC auth forms, check acc form, orders, '97	
	609	Info Stor	480		91456			Wk #42 RBA Oct 97	
	610	Info Stor	481		91456			Wk #37-48 Misc. wk. RBA's order forms, July/Sep 97	
	611	Info Stor	482		91456			BTI 439-457-97	
	612	Info Stor	483		91456			BTI 438-473	
	613	Info Stor	484		91456			BTI 287-399	
	614	Info Stor	485		91456			BTI 400-438	
	615	Info Stor	486		91456			UPS invoices 01/03/98-01/31/98	
	616	Info Stor	487		91456			UPS invoices 12/1/97 - 12/27/97	
	617	Info Stor	488		91456			UPS invoices 02/20/98 - 02/28/98	
	618	Info Stor	489		91456			Product order forms & applications	Yes
	619	Info Stor	490		91456			BTI apps	Yes
	620	Info Stor	491		91456			BTI (phone) registration & applications	Yes
	621	Info Stor	492		91456			BTI apps. Week 41 - 43, 1997	Yes
	622	Info Stor	493		91456			Applications & pick order forms	Yes
	623	Info Stor	494		91456			BTI apps / orders 1997	Yes
	624	Info Stor	495		91456			BTI apps	Yes
	625	Info Stor	496		91456			Prod Order forms Apr 1997	Yes
	626	Info Stor	497		91456			RBA buy-out Oct 97	Yes
	627	Info Stor	498		91456			S-1 SEC Filing	
	628	Info Stor	500		91456			Regulatory issues by state	Yes
	629	Info Stor	500	C	91456			S-1 SEC Filing	
	630	Info Stor	501		91456			Attorney files (Sikerman, Graham)	
	631	Info Stor	503	C	91456			BTI Referral Forms/ Rep Sweeney Forms	
	632	Info Stor	504	C	91456			Cash Out Requests	
	633	Info Stor	505	C	91456			SEC - VS - IHI Correspondence	
	634	Info Stor	506	C	91456			North Carolina	
	635	Info Stor	507	C	91456			Attorney General Cash Out correspondence by state	Yes
	636	Info Stor	508	C	91456			Attorney General Cash Out correspondence	
	637	Info Stor	509	C	91456			Attorney General Cash Out correspondence	
	638	Info Stor	510	C	91456			NC AG Intelligence for CIO	
	639	Info Stor	511	C	91456			Attorney General Cash Out correspondence by state	
	640	Info Stor	513	C	91456			Attorney General Cash Out correspondence	
	641	Info Stor	514	C	91456			NCAG Cashout correspondence	
	642	Info Stor	515	C	91456				

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	ITEM #	STORE STATE	BON #	ACCT NO.	DATE RECEIVED	ORIG	COPY	DOC BEGIN	DOC END	AUTHOR FROM TO	ADRESSEE	DOC DATE	CONTENT	JURY	GRAND
1	643	Info Stor	517	C		91458									NCAG Cashout correspondence		
	644	Info Stor	518	C		91458									Cashouts		
	645	Info Stor	519	C		91458									Cashouts		
	646	Info Stor	520	C		91458									Cashouts		
	647	Info Stor	521	C		91458									Cashouts filed individually by name		
	648	Info Stor	522	C		91458									Cashouts		
	649	Info Stor	524	C		91458									Montana related exp corr.		Yes
	650	Info Stor	525	C		91458									Montana State files correspondence		
	651	Info Stor	526	C		91458									BTI Stamps		
	652	Info Stor	530	C		91458									State Regulatory		
	653	Info Stor	532	C		91458									State Agreements		
	654	Info Stor	533	C		91458									Montana refund spreadsheet, Montana refund files		
	655	Info Stor	537	C		91458									Misc individual files Alabama, Georgia cashouts		
	656	Info Stor	538	C		91458									Catalogs, Bus. Journals, Success Mag		
	657	Info Stor	539	C		91458									Brochures, Forms, apps, etc.		
	658	Info Stor	540	C		91458									AV video tapes, RBA's go file/scanned		
	659	Info Stor	541	C		91458									Flip Charts		
	660	Info Stor	542	C		91458									Cashouts		
	661	Info Stor	542	C		91458									Audio Tapes		
	662	Info Stor	800			91458									Centra CC disputes (C-Z)		
	663	Info Stor	804			91458									Centra credit card disputes M-Z '98		
	664	Info Stor	804			HR									Employee Handbooks		
	665	Info Stor	808			91458									Humboldt Bank M-Z card disputes (1998)		Yes
	666	Info Stor	808			91458									Winnfield Credit card disputes from United M-Z '98		Yes
	667	Info Stor	810			91458									Chittenden - S Jan - May '98		
	668	Info Stor	812			91458									Nova Credit card disputes		
	669	Info Stor	814			91458									Humboldt Bank A-L c card disputes (1998)		
	670	Info Stor	816			91458									Chittenden A-H Jan - Mar '98		
	671	Info Stor	819			91458									Misc. NC PIP work		
	672	Info Stor	820			91458									Autoship enrollment forms		
	673	Info Stor	824			91458									Retail receipt forms		
	674	Info Stor	826			91458									Applications/ Receipt forms		
	675	Info Stor	828			91458									RBA Applications		
	676	Info Stor	830			91458									RBA - misc C, S, PPUDER		
	677	Info Stor	834			91458									Autoship/RBA's		
	678	Info Stor	836			91458									Rep Applications		
	679	Info Stor	838			91458									Development certificates		
	680	Info Stor	840			91458									Rap Applications and buyouts		
	681	Info Stor	842			91458									CX requests		
	682	Info Stor	844			91458									MISC. paperwork, stationery, supply order forms, apps		
	683	Info Stor	846			91458									Match autoships		
	684	Info Stor	848			91458									W-9 Receipts		
	685	Info Stor	850			91458									Receipt forms and W-9s		
	686	Info Stor	852			91458									Wk 30 RBA Receipt forms		
	687	Info Stor	854			91458									Receipt forms and W-9s		
	688	Info Stor	856			91458									Receipt forms		
	689	Info Stor	859			91458									W-9,G-H '98, RBAs, IHI demand letters		Yes
	690	Info Stor	860			91458									Retail receipts, apps, W-9s		
	691	Info Stor	861			91458									Volume applications, receipts		
	692	Info Stor	862			91458									Wk 4 Receipt forms W-9s		
	693	Info Stor	864			91458									Wk 44 receipt forms, apps, W-9s		
	694	Info Stor	865			91458									Product forms/receipt forms, apps		
	695	Info Stor	866			91458									UPS billing		
	696	Info Stor	867			91458									Development certificates Doc 98-97		
	697	Info Stor	868			91458									Wk 3 Receipt forms		
	698	Info Stor	869			91458									Wk 11-30 Montana copies, apps and autos/tips		
	699	Info Stor	872			91458									UPS bills		
	700	Info Stor	874			91458									UPS invoices		
	701	Info Stor	875			91458									UPS - All labels 08/21 - 09/7/2		
	702	Info Stor	876			91458											
	703	Info Stor	878			91458											
	704	Info Stor	879			91458											

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	INFO STORE	STORE#	DATE RECEIVED	DOC ID	DOC BEGIN	DOC END	ADDRESS	DEPT	DOC DATE	DOCUMENT	STAND ALONE
-	705	Info Stor	881	580	9/14/95							Completed reports, budgets	
-	706	Info Stor	900	5	9/14/95							I/H 47 Apps W-9 Prod. Forms RBA receipt forms	
-	707	Info Stor	901	5	9/14/95							Shareholder info/convertible notes	
-	708	Info Stor	903	5	9/14/95							C - EC Shareholder info	
-	709	Info Stor	904	5	9/14/95							M - SC Shareholder info	
-	710	Info Stor	905	5	9/14/95							Convertible Notes	
-	711	Info Stor	906	5	9/14/95							H.A - KE Shareholder info	
-	712	Info Stor	908	5	9/14/95							ED - HA Shareholder info	
-	713	Info Stor	908	5	9/14/95							MC - PH Shareholder info	
-	714	Info Stor	9	1	9/14/95							Cash/Sales Journal 08/26/95-07/19/96	
-	715	Info Stor	9	2	9/14/95							Cash/Sales Journal 08/26/95-07/19/96	
-	716	Info Stor	9	3	9/14/95							Nationbank deposit log 07/18/95-07/19/96	
-	717	Info Stor	9	4	9/14/95							Sales/Cash Journals/NBICP/Cash Trans	
-	718	Info Stor	9	6	9/14/95							UPS Acct. Jan 96 to Oct 96	
-	719	Info Stor	9	7	9/14/95							EB Harvey	
-	720	Info Stor	9	8	9/14/95							Sales/Cash Post Journal	
-	721	Info Stor	9	9	9/14/95							General Acct. Info	
-	722	Info Stor	9	10	9/14/95							IHI - USA Financial Jan - Aug 96	
-	723	Info Stor	9	11	9/14/95							IHI May - July-Oct-Dec '95	
-	724	Info Stor	9	12	9/14/95							1995 Mc. Sum. Reports & J. etc.	
-	725	Info Stor	9	13	9/14/95							Sales/Cash Posting Journals	
-	726	Info Stor	9	14	9/14/95							Sales posting journals	
-	727	Info Stor	9	15	9/14/95							IHI CND Hold Financial Etc.	
-	728	Info Stor	9	16	9/14/95							1995 Journal Post replace, etc.	
-	729	Info Stor	9	17	9/14/95							Cash Trans CC post Etc.	
-	730	Info Stor	9	21	9/14/95							IHI Canada Sept - Dec 95/IHI CND GL/EDM reports, etc.	
-	731	Info Stor	9	22	9/14/95							Sales Tax/Rhode Island 96	
-	732	Info Stor	9	25	9/14/95							Cash posting journals 07/02/95-07/11/95, 12/03/95-04/02/97	
-	733	Info Stor	9	26	9/14/95							Cash posting journals 04/02/97-05/11/97	
-	734	Info Stor	9	27	9/14/95							Sales posting journal 07/11/95-07/17/95, 11/27/95-02/03/97	
-	735	Info Stor	9	28	9/14/95							Sales posting journal 02/07/97 - 03/18/97	
-	736	Info Stor	9	29	9/14/95							Sales posting journal 02/07/97 - 03/18/97	
-	737	Info Stor	9	32	9/14/95							Argocprint Plus/MCI 1995 invoices	
-	738	Info Stor	9	33	9/14/95							UPS Invoices 03/09/97-07/19/96	
-	739	Info Stor	9	34	9/14/95							Sales Tax SC - WI 1995	
-	740	Info Stor	9	35	9/14/95							Sales Tax AL - VA 1995	
-	741	Info Stor	9	38	9/14/95							Sales Post Journal 5/97 Slip V/Debit/Credit	
-	742	Info Stor	9	39	9/14/95							Cash Trans Journal 7/95-03/97	
-	743	Info Stor	9	40	9/14/95							Cash Journal 03/09/97-05/08/97	
-	744	Info Stor	9	41	9/14/95							Sales posting journals 5/97-07/97	
-	745	Info Stor	9	42	9/14/95							Bank Dep. 4/97 - 8/97	
-	746	Info Stor	9	43	9/14/95							Nationbank dep 11/95-03/97, Centura 7/97	
-	747	Info Stor	9	44	9/14/95							CND Invoice/nationbank/dep - US March CC Slips	
-	748	Info Stor	9	45	9/14/95							UPS 03/09/95-05/97	
-	749	Info Stor	9	46	9/14/95							Bulova Corp. 01/97-07/97 FB Harvey 01/97-05/97	
-	750	Info Stor	9	47	9/14/95							Nat Convention & Cred. Slips 03/97	
-	751	Info Stor	9	48	9/14/95							Bonus Run 01/95-12/96 WK 1-8/97 earnt & Wkly mgr report	
-	752	Info Stor	9	49	9/14/95							Item sale warehouse/spec Atlanta invoice Dec 96	
-	753	Info Stor	9	50	9/14/95							Spec Atlanta invoices/Jewels by Economy EB Harvey	
-	754	Info Stor	9	51	9/14/95							Journal Entries (US) 04/95-05/97 (CND) 04/97-05/97/96	
-	755	Info Stor	9	53	9/14/95							Cash Trans Report 05/97-07/97 Sales Posting Journal	
-	756	Info Stor	9	54	9/14/95							Cash Post Journal Cash Trans 07/97-08/97 Debit/Credit Memos 03/97-	
-	757	Info Stor	9	55	9/14/95							06/97	
-	758	Info Stor	9	56	9/14/95							Sales Post Journal 07/97-08/97 Cash Post	
-	759	Info Stor	9	57	9/14/95							Nationsbank operating 1995-1996	
-	760	Info Stor	9	58	9/14/95							Sales Post Journal 03/97-05/97 ship journal verif 03/97-03/97	
-	761	Info Stor	9	59	9/14/95							Wolf - office production	
-	762	Info Stor	9	60	9/14/95							Wolf - K-N-D files	
-	763	Info Stor	9	61	9/14/95							Wolf - P-N-D files	
-	764	Info Stor	9	62	9/14/95							Wolf - P-T-D files	
-	765	Info Stor	9	63	9/14/95							Wolf - U-Z-D files	
-	766	Info Stor	9	64	9/14/95							Wolf - TRIN - 10ks - matters	

## IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	ITEM #	STORE	DATE RECEIVED	DOC. COPY	DOC.BEGAN	DOC-END	AUTHOR FROM TO	ADDRESSSEE	REG DATE	COMMENTS	GRAND JURY
	766	Info Stor	7		9/19/11							Wolf - TRIN Audit - reg - less	
	767	Info Stor	8		9/19/11							Wolf - EDD files	
	768	Info Stor	9		9/19/11							Wolf - A-C D.D. files	
	769	Info Stor	10		9/19/11							Wolf - C-D D.D. files	
	770	Info Stor	11		9/19/11							Wolf - Stan desk notes	
	771	Info Stor	12		9/19/11							Wolf - Stan desk notes NY memos	
	772	Info Stor	13		9/19/11							Wolf - Stan desk notes NY memos	
	773	Info Stor	14		9/19/11							Wolf - train - compl - press rec	
	774	Info Stor	15		9/19/11							Wolf - Stan's file compliance	
	775	Info Stor	16		9/19/11							Wolf - NASD - SEC blue sky personnel	
	776	Info Stor	17		9/19/11							Wolf - complaints memos	
	777	Info Stor	18		9/19/11							Wolf - Def/Utility ex. tapes, awards	
	778	Info Stor	20		9/19/11							Wolf - def pretrial notebooks, jury ex	
	779	Info Stor	21		9/19/11							Wolf - Stan's desk files, pleadings	
	780	Info Stor	22		9/19/11							Wolf - misc non trial	
	781	Info Stor	23		9/19/11							Wolf - misc non trial	
	782	Info Stor	24		9/19/11							Wolf - misc non trial	
	783	Info Stor	25		9/19/11							Wolf - misc non trial	
	784	Info Stor	26		9/19/11							Wolf - misc non trial	
	785	Info Stor	27		9/19/11							Wolf - misc non trial	
	786	Info Stor	28		9/19/11							Wolf - misc non trial	
	787	Info Stor	29		9/19/11							Wolf - misc non trial	
	788	Info Stor	30		9/19/11							Wolf - misc non trial	
	789	Info Stor	31		9/19/11							Wolf - misc non trial	
	790	Info Stor	32		9/19/11							Wolf - misc non trial	
	791	Info Stor	33		9/19/11							Wolf - misc non trial	
	792	Info Stor	34		9/19/11							Wolf - misc non trial	
	793	Info Stor	35		9/19/11							Wolf - misc non trial	
	794	Info Stor	36		9/19/11							Wolf - misc non trial	
	795	Info Stor	37		9/19/11							Wolf - misc non trial	
	796	Info Stor	38		9/19/11							Wolf - misc non trial	
	797	Info Stor	39		9/19/11							Stan sale book	
	798	Info Stor	40		9/19/11							Stan sale book	
	799	Info Stor	41		9/19/11							Wolf motions	
	800	Info Stor	42		9/19/11							Wolf motions	
	801	Info Stor	43		9/19/11							1986 taxes	
	802	Info Stor	44		9/19/11							1987 taxes	
	803	Info Stor	54		9/19/11							1988 taxes	
	804	Info Stor	55		9/19/11							1989 taxes	
	805	Info Stor	56		9/19/11							1990 taxes	
	806	Info Stor	59		9/19/11							1991 taxes	
	807	Info Stor	60		9/19/11							NY specific misc and 1990 canceled checks, invoices	
	808	Info Stor	61		9/19/11							Gordano's files, engagement letter	
	809	Info Stor	62		9/19/11							Gordano's files	
	810	Info Stor	63		9/19/11							NASD Mattews arbitration	
	811	Info Stor	64		9/19/11							Misc notebooks	
	812	Info Stor	65		9/19/11							Election Tech Co (ETC)	
	813	Info Stor	67		9/19/11							ETC	
	814	Info Stor	68		9/19/11							ETC	
	815	Info Stor	69		9/19/11							Bacciagalupes	
	816	Info Stor	70		9/19/11							Bacciagalupes	
	817	Info Stor	71		9/19/11							Bacciagalupes	
	818	Info Stor	72		9/19/11							Bacciagalupes	
	819	Info Stor	74		9/19/11							Sunshine	
	820	Info Stor	75		9/19/11							Sunshine	
	821	Info Stor	76		9/19/11							Sunshine	
	822	Info Stor	77		9/19/11							Oro Verdin-RiesZuchanilics	
	823	Info Stor	79	A	9/19/11							BookMarketing	
	824	Info Stor	80	A	9/19/11							Kontschoub	
	825	Info Stor	81		9/19/11							Business Leader	
	826	Info Stor	83		9/19/11							First Hospitality/Alstate Supply	
	827	Info Stor	85		9/19/11							Touch of Class, GMM letter note	
					1-823-1							1994 taxes	
												1995 taxes	
												ETC tax docs	
												Excel, NFL, Tupperware	
												1987 FM Wolf trial	

IHI RECORDS / EVIDENCE INVENTORY

BOX CODE	BOX #	SOURCE	Incr.	STORE STOR	DATE RECEIVED	DOC#	ACCT NO.	DATE DOC BEGIN	DOC END	AUTHOR FROM TO	DESCRIBE	GRAND JULY		
												SVE	SVE records/boxes 90, devlmt	
-	828	Info Stor	87		91911				I-828-1					
-	829	Info Stor	88		91911				I-828-4333					
-	830	Info Stor	91		91911									
-	831	Info Stor	92		91911									
-	832	Info Stor	93		91911									
-	833	Info Stor	94		91911									
-	834	Info Stor	95		91911									
-	835	Info Stor	96		91911									
-	836	Info Stor	97		91911				I-836-1					
-	837	Info Stor	98		91911				I-837-1					
-	838	Info Stor	99		91911				I-838-1					
-	839	Info Stor	100		91911				I-838-845					
-	840	Info Stor	101		91911									
-	841	Info Stor	102		91911									
-	842	Info Stor	103		91911									
-	843	Info Stor	104		91911									
-	844	Info Stor	105		91911									
-	845	Info Stor	106		91911									
-	846	Info Stor	215		91911									

## WOOD FRANCIS, PLLC

GRAND JURY								
BOX CODE	INFO/STORE BOX #	DATE RECEIVED	DOC#	DOC BEGIN	AUTHOR FROM	ADDRESSEE TO	DOC DATE	CONTENTS
MF	1	Wood & Francis - Mayflower	4/3/2000	X				Mayflower Aviation corporate records and accounting (alphabetized folders A-L); Corporate Docs; Articles of Organization; Operating Agreement loan to IH. Individual folders labeled as follows: Agras; Airplane Improvements; Alpha Capital Services; Atlanta Turbine; Cellular One; Centura Bank - contains Mayflower Aviation credit card receipts; Centura - operating account containing account statements, bank docs, voided checks; Centura - payroll account statements and deposits; Chanter Services; Commercial Financing; Co-Pilot Fees; Diamond Aviation - sale of plane; Duncan Aviation; Eller, Jones, Brown and McLeod billing statements; EPPS Air Service; FBO; FCC; FedEx; Finova; Garrett Aviation; Healthsource / Subrental; Hill Aircraft & Leasing; Insurance; Michael Jarrett; Loan Documents; Leasing Agreements; Landing Fees.
MF	2	Wood & Francis - Mayflower	4/3/2000	X				Mayflower Aviation corporate records and accounting (alphabetized folders M-W). Individual folders labeled as follows: Mayflower Capital - checks and credit card statements; NationsBank operating and payroll accounts; Piedmont Aviation; Pilot Resumes; Promissory Notes - IH; Quality Aviation; SVE Personal Info - Tax Returns; Closing Docs for Plane; Raleigh Flying Service; Rapid Forms; Raytheon Aircraft Services; RDU Avionics, LLC; Reimbursable Expenses; Shipping Expenses; Stevens Aviation; Subscriptions; SVE Investment Checks; Transportech Corp.; US Dept. of Commerce; Kerry Van Etten - expense reports and payroll; Wachovia Operating - Deposits - Voided checks; Wood & Francis
MF	3	Wood & Francis - Mayflower	4/3/2000	X				Mayflower Aviation Corporate records and payroll taxes; Mayflower Aviation correspondence & client documents; Aircraft purchase documents; Management and lease agreement with Raleigh Flying Service, Inc.; Hangar Lease Agreement; Aircraft Lease Agreements; Mayflower Aviation Financial Statements; 1998 airplane advertisements; Business & financing plan 10/18/98 - 10/26/98; doddod Flight logs; Payroll taxes.
MF	4	Wood & Francis - Mayflower	4/3/2000	X				Files labeled in order - files of paid bills: Assets & inventory - has clear folder w/ label "Exh 1"; Book sales info; File for invoices and comes b/w EJBZ M (CPA); Mayflower Holdings financial statements for 1995 & 1996; Mayflower Holdings loans payable & receivable list.
MF	5	Wood & Francis - Mayflower	4/3/2000					Business records, correspondence, contracts, letters; Mayflower & NASD correspondence - 1997 letter from Mackey explaining IH losses; Mayflower promissory notes w/ IH & others; Mayflower Capital, LLC business and capital funding plan; Various documents b/w MF & BTI; Various documents b/w MF & Western Feed Yard & Trade Co.; Audit letter from WAF to CPAs; Mayflower Aviation - transfer or plane.

Exh. 3

## WOOD FRANCIS, PLLC

BOX CODE	BOX #	SOURCE	INFOSTORE BOX#	DATE RECEIVED	DOC ID	DOC BEGIN	DOC END	AUTHOR FROM	ADDRESSEE TO	DOC DATE	CONTENT
MF	6	Wood & Francis - Mayflower		4/3/2000 X							Labeled only as "Box 6" with other W&F boxes. Mayflower Capital BALA documents, Mayflower Hunt Club - Anderson Dispute; Balala Industry Info; Mayflower Capital - Covington Energy, Inc.; BALA Moveable Beamer, LLC - Articles of Organization and Information.
MF	7	Wood & Francis - Mayflower		4/3/2000							1997 and 1998 binders include SV/E calendars; Mayflower Aviation binder includes 1998 income statement, 1998 bank record, 1998 journal, 1998 check register, 1998 & 1997 financial statements; folder of Mayflower Aviation canceled checks & bank statement.
MF	8	Wood & Francis - Mayflower		4/3/2000							Bank records, invoices paid: Mayflower Holdings bank statements & canceled checks for NationsBank acc't #040231920 for months ending 12/29/95, 1/31/96, 2/28/96, 3/31/96, 4/30/96, 5/31/96, 6/28/96, 7/31/96, 8/30/96, 9/30/96, 10/31/96, 11/28/96, 12/31/96; Loans made to Mayflower Holdings from IH (or paid off loans); Bundle labeled "IH 1098" (moved to front of box) for 1998; Mayflower Holdings financial statement for 1995, 1996; Handwritten notes (probably SV/E) on legal pad (near front of box).
MF	9	Wood & Francis - Mayflower		4/3/2000							1997 Mayflower Holdings - summary trial bal & journal report; All amt paid to W&F by Mayflower Holdings; Balance sheet 1996 - accounting working papers & canceled checks; Promissory note to EJB&M by MF Holding & related documents; 1997 paid invoices & canceled checks; Bank statements Mayflower Holdings NationsBank account #0040231920 for months ending 1/31/97, 2/28/97, 3/31/97, 4/30/97, 5/31/97, 6/30/97, 7/31/97, 8/30/97, 9/30/97, 10/31/97, 12/31/97; One envelope of Mayflower Aviation canceled checks.
MF	10	Wood & Francis - Mayflower		4/3/2000							Mayflower Capital corporate records and legal documents; Leasing of aircraft agreement, NASD correspondence - broker - dealer application, 1997 audit inquiry response, Escrow agreement - EPP Finanz AG, Final private placement memorandum - EPP, Mayflower Capital LLC operating agreement, Third party stock pledge agreement, Loan to 2021 Interactive, LLC - 5/1/97 - promissory note and correspondence, underwriting agreement, Bank statements, deposit slips, income tax returns, Mayflower Capital, LLC - corporate notebook.
MF	11	Wood & Francis - Mayflower		4/3/2000 X							Mayflower Capital regulatory documents: Modification of Restrictive Agreement - National Adjudication Council - 5/2/98, Securities Dealer Blanket bond Policy - National Union Fire Insurance, NASD documents, Central registration Depository (CRD) docs, Stock Option Docs, Securities registration (broker - dealer) for individual states, Correspondence w/ Kutak Rock and Wyrick Robbins.
MF	12	Wood & Francis - Mayflower		4/3/2000							Incorporation materials & bank records: Black binder - Mayflower Venture Capital, LLC corporate records (articles, bylaws, minutes), Bank statement folder - NationsBank #050329873 & Centura Bank canceled checks.
MF	13	Wood & Francis - Mayflower		4/3/2000							Removed by A Flanagan prior to production

## WOOD FRANCIS, PLLC

BOX CODE	BOX #	SOURCE	INFOSTORE DATE RECEIVED		DOC BEGIN	DOC END	AUTHOR FROM	ADDRESSEE TO	DOC DATE	CONTENTS	GRAND JURY
			INFOSTORE BOX #	DATE RECEIVED							GRAND JURY
MF	14	Wood & Francis - Mayflower		4/3/2000						Mayflower investments & business deals: mayflower stock certificates (copies), Mayflower investment in Sun Forest Systems (1986), File on documents related to Building, Bonds issued by Netech, Inc. to Mayflower Venture Capital, Carolina Soccer Venture, LLC private placement memo, Raleigh Flyers info.	
MF	15	Wood & Francis - Mayflower		4/3/2000						Corporate documents, loans, accounting works: Mayflower Holdings Inc. stock info; & corporate records; Black binder - Mayflower Holdings, Inc. 1986 A/P, Journal report, Check Register; Mayflower Holdings, Inc. accounting work 1986.	
MF	16	Wood & Francis - Mayflower		4/3/2000						Mayflower Venture Capital Investor list: Allen L. Aymond J. B & E Investment Group, Battaglia A. J., Bisbey, Boca, Bratton B., Brothers Dee, Brown S. & K., ??ming N., Cassese R. & S., Chalmers, Daniel J., Deammon, Dunt Clyde, Dismain, Dick R & C., Ean's Tire Store, Eckenthal, Evonne, Elliott, Fuentes James, Gallop, Geoffrey Charles, Geofroy Eric, Geoffrey Lloyd Jr., Griffin William, Hart Frank, Holt D & K., Honeycutt, Hopson Ronald, Ins. Mgmt. Group, International ULD Inc., Isbell K., Jackson J., Johnston S. & C., Jones C. & J., Kenne, F., Knowles J. & P., LeBlanc J., Leisure Time Rental & Mgmt, Inc., Lewis B., Weatherly J., Wrigate D., Yarbrough K & A., McDaniel Air Conditioning, McAvoy S., McDaniel M., Maines H., Martin P. & J., Ming R., Ming R. & P., Moore A. & L., Moore J., Omega Leasing, O'Brien, Paradise Investments, Petter H., Queen H & L., Propat D., Rodgers C., Badger D & C., Ross F., Rudd K & T., Runion M & N., Savage C & J., Schnell P., Sheehan J., Siemian W. & C., Simonson L., Sims D., Spoon J., Stan H & G., Strickland R., Taylor B., Underwood W. & J., Valentine C., Van Etten, Vincent A. & B., Waite B. & D.	
MF	17	Wood & Francis - Mayflower		4/3/2000						Mayflower Holdings Accounting (M-Z): Mayflower Cattle Co UC, Mayflower Hunt Club, Mayflower Holdings minutes, Mountainer Archery, Aircraft Lease Agreement, Bc of CPA Examiners Inquiry, MFH operating account, voided checks, transfers, payroll account, Montgomery's, NatCom, Nenaz Communications, Office Max, Office Space, Parisa Hallbold M. Jones seamstress, Raleigh Soccer, Rapid Form, Raymond James & Assoc., Reed Reference Publishing, Photo Processing, Printing Plus, Prudential Health, Reimbursable Expenses, Revenue, Sales Training, Scott & Stringfellow, Securities Consultants, SPS Investment, Stationery, State Farm, Subiects, SysTech, Tax Records, Telequest, Travel Expenses, Triangle Business Journal, US Post Office, Vector Properties, Wachovia Operating, Wake County Bar Assoc Advertising, MFH Website, Web Path, Wood & Francis, Wyndie Robbins.	
MF	18	Wood & Francis - Mayflower		4/3/2000						Mayflower Capital -1988 payroll tax promissory note loan to IH October 1988, balance statements, vendor invoices, insurance vendors, working papers (financial statements, account balances, insurance commission statements, Cantura Bank account statements opened 10/17/97 (cleared & voided checks, other bank account docs), payroll docs, employee forms.	
MF	19	Wood & Francis - Mayflower		4/3/2000						Mayflower Capital -1988 payroll tax promissory note loan to IH October 1988, balance statements, vendor invoices, insurance vendors, working papers (financial statements, account balances, insurance commission statements, Cantura Bank account statements opened 10/17/97 (cleared & voided checks, other bank account docs), payroll docs, employee forms.	Yes

## WOOD FRANCIS, PLLC

BOX CODE	BOX #	SOURCE	INFOSTORE DATE RECEIVED		DOC BEGIN	DOC END	AUTHOR FROM	ADDRESSEE TO	DOC DATE	CONTENTS	GRAND JURY
			ORIG BOX #	DOC #							
MF	19	Wood & Francis - Mayflower			4/3/2000	X				Mayflower Capital - ADP Easy Pay docs, 1985- 1997 Invoices paid, daily hold exceptions. (August - October 1998), Mark Burgess trading account Olds Discount Corp., Enz Bansas trading account, account records, securities reports, Burgess & Barnes expense accounts, stock exchange agreements, 1998 MFC NationsBank operating account (payroll account, etc.), Everett checks, reports, security inventory activity.	Yes
MF	20	Wood & Francis - Mayflower			4/3/2000					Financial & corporate documents & tax papers (SIC-1 for all members), 1998 MF venture capital financial statement, offering circular, registration material, "Use of Proceeds" folder.	Yes
MF	21	Wood & Francis - Mayflower			4/3/2000	X				Mayflower Capital miscellaneous: weekly reports, payroll taxes, business plan, commission reports, employee contracts, expense reports, payable / receivable taxes, clearing information (ILX/Beta docs installation, reference, Everett contract).	No
MF	22	Wood & Francis - Mayflower			4/3/2000					Paid invoices, Mayflower Capital financial statements.	No
MF	23	Wood & Francis - Mayflower			4/3/2000					Mayflower Capital client list A-M.	No
MF	24	Wood & Francis - Mayflower			4/3/2000					Mayflower Capital client list M-Z and a few accounting files (paid invoices)	No
MF	28	Wood & Francis - Mayflower			4/3/2000					Mayflower Aviation banking and financial records including client invoices, IHI checks payable to Aviation, Raleigh Flying Services, Wachovia account #6260-051-481 8/30/98, 10/30/98, 11/30/98, tax return & financial statements for 1998.	No
MISC	6/1	Brent Wood			8/16/2000	X				Venture Capital 1997 income tax.	No
MISC	6/2	Brent Wood			8/16/2000	X				Mayflower Holding bank statements including NationsBank #300040231920 for 1/31/98 - 5/31/98, Centura Bank for 1/31/98 - 6/30/98, Wachovia account #6267051473 for 6/30/98 - 12/31/98.	No
RLF	1	Ragdale, Liggett & Foley								Mayflower Capital documents including registered investment advisor documents, document relating to private offering for Ball's Moveable Barrier, LLC.	No
										Mayflower Venture Capital ongoing matters.	
										Mayflower Holdings ongoing matters.	
										Telequest LLC promissory notes/guarantees, Nunez bills, ACMI, Telequest - Star Van Etten - correspondence, client docs, memo of understanding, discovery, General corporate - Telequest LLC, Triangle Soccer Ventures - client docs, pleadings.	No
										IHI shareholder list 4/2/98, Wood & Francis employee list 1988-98; manila files re Alan Woodall, R Gene Davis Jr., Wood & Francis IHI account, stock option agreements, time slips; wire transfers.	Yes
										Wood & Francis PLLC Privilege Lists	
										IHI shareholder list 4/2/98, Wood & Francis employee list 1988-98; manila files re Alan Woodall, R Gene Davis Jr., Wood & Francis IHI account, stock option agreements, time slips; wire transfers.	Yes
										Note: Several pages withheld as privileged. Detailed index is in front of contents. Contents include stock offering information, MoJick letters to shareholders, letters regarding promissory notes, and non-competition agreements.	Yes

# WOOD FRANCIS, PLLC

BOX CODE	BOX #	SOURCE	INFOSTORE DATE RECEIVED		DOC END	DOC BEGIN	AUTHOR FROM	ADDRESSEE TO	DOC DATE	CONTENTS	GRAND JURY
			BOX #	DATE RECEIVED							
WF 1	Wood & Francis				X					Civil lawsuits filed 1998. IHI press releases, IHI suit against sales rep, John Brothers, and SEC. Various IHI docs, Kara agreement, IHI & SEC, suits against FN Wolfe.	Yes
WF 2	Wood & Francis				X					Newspaper articles (1998), IHI docs & internal docs, Mayflower Capital letter (1999). IHI debt holders will convert to equity (Europe & US), 1988 sales & use tax comes, emails. "12/16/97 list of employees & stock held, 1997 "President's Advisory Board" & addresses, Kara agent, civil lawsuit (Greene) and others.	Yes
WF 3	Wood & Francis									Civil lawsuits, "general releases" by numerous people, Kara merger docs, various financial statements, corras w/ Win Capital re: IPO 1997. Amendment to registration - changes made by CPA (1997). SEC comes, "Lock up Agreement" by IHI officers & directors re: their IHI shares, list of all IHI shares gifted to Mayflower 12/31/96.	
WF 4	Wood & Francis									Mecklenstock, Marsh and misc legal suits	
WF 5	Wood & Francis									SEC v IHI (GA) docs, EFBM presentation to Federal District Ct, Mayflower Capital comes, general IHI docs, bankruptcy proceedings for IHI, Montana matter - 1998.	Yes
WF 6	Wood & Francis									SEC v IHI comes, misc IHI docs, Attorney notes, SEC registration.	Yes
WF 7	Wood & Francis									Louisiana matter, other states, newspaper articles IHI.	Yes
WF 8	Wood & Francis									SEC docs - 1998, Bid of Directors 1997 docs re bond sales, IHI - Prologica merger, corras, Kara IHI merger docs.	Yes
WF 9	Wood & Francis									SEC registration doc, SEC v IHI docs, MCI docs, employee stock option doc, NC Atty General comes.	Yes
WF 10	Wood & Francis									Lawsuit printouts, comes, SEC v IHI docs, Net Tech IHI docs, Attwney and other cases - plaintiffs, Better Bus Bureau Comes, policies & procedures for IHI.	
WF 11	Wood & Francis									Billing statements for Wood & Francis' legal services for representation of IHI 1998-1998.	Yes
WF 12	Wood & Francis									Summary of bond transfers, IRSR compensation plans, IHI deposit records, Miscellaneous litigation materials.	Yes
WF 13	Wood & Francis									SEC registration drafts, IHI financial statements, IHI prospectus - 1997, shareholder lists, licensing and trademark docs.	Yes
WF 14	Wood & Francis									Billing reports, etc. for IHI, Board of Directors meeting minutes, stock info 1997-1998, sales reports, docca re NC Attorney General 1997-1998.	Yes
WF 15	Wood & Francis									IHI term sheets, WIN Capital Agency agreement, billing records, general corporate docs, shareholder info, Prologica merger docs, Bridge Ventures docs, reacquisition offer docs.	Yes
WF 16	Wood & Francis									Employment contracts, misc litigation docs, IHI financial statements, IHI personnel docs, stock offering - Sept. 1994 - Mar. 1996.	Yes
WF 17	Wood & Francis									Board of Directors files	Yes
WF 18	Wood & Francis									Documents provided to State regulators for individual inquiries, general corporate documents (lien docs, conference info, etc.) incorporation documents, Knowles secured loan docs.	Yes

## WOOD FRANCIS, PLLC

BOX CODE	SOURCE	INFOSTORE DATE		DOC RECEIVED	DOC BEGIN	DOC END	AUTHOR FROM	ADDRESSEE TO	DOC DATE	CONTENTS	GRAND JURY
		BOX #	BOX #								
WF 19	Wood & Francis		X							Shareholder docs (proxy, promissory note, debt to equity conversion from Aug. 1995, financial statements sent with U-7 stock offering in 1995. Various correspondence from Mollick re: IHI from 1996, shareholders list from 1996.	Yes
WF 20	Wood & Francis		X							1996 shareholder's meeting - proxies and other materials, proxy material from Aug. 1995, shareholder lists (Fall '95 - Winter '96)	Yes
WF 21	Wood & Francis		X							Sales Reps Policies Manual, Shareholders Questionnaires, Phone bills from MCI (related to IHI's dispute w/ MCI) in 1996-1997, Audit Inquiry correspondence from Mollick to EJBM - Aug. 1996 - Feb. 1997.	Yes
WF 22	Wood & Francis		X							1996 IHI corporate documents & comes	Yes
WF 23	Wood & Francis									1995-1996 IHI recession offer documents	Yes
WF 24	Wood & Francis									1996-1997 documents re IHI securities registration in several states. Most folders in ref to WIN Capital & Richard Heller; EDGAR Manus.	Yes
WF 25	Wood & Francis									SEC registration info 1995-1996, escrow agreement - underwriter WIN Capital	Yes
WF 26	Wood & Francis									1997 underwriting docs / recapitalization / securities issuer questionnaire; Due Diligence requests 1997, disciplinary letter to IHI reps 1997, shareholders lists 1997, letter to Alan Hirsh, Special Deputy to the AG, Consumer Protection Division, Raleigh, NC dated 5/14/97, NC MLM Marketing Plan, Exhibit 1	Yes
WF 27	Wood & Francis									Preliminary Sept 1997 NC sales	Yes
WF 28	Wood & Francis									IHI independent retail sales rep forms	Yes
WF 29	Wood & Francis									1997 referral packages	Yes
WF 30	Wood & Francis									Dec. 97 & Jan 98 reports to AG's office	Yes
WF 31	Wood & Francis									Referral telecommunications packages	Yes
WF 32	Wood & Francis									1997-1998 correspondence re legal matters & legal agreements. Confidential letter to individuals re stock purchases 1998, amended letter of proposed stock plan, buyout/tenant agreements for IHI & Mayflower, license agreement - Mayflower 1997 - Tyra 1998, shareholders Washington state.	Yes
WF 33	Wood & Francis									Conversion debenture 1999	Yes
WF 34	Wood & Francis									Litigation - 1998	Yes
WF 35	Wood & Francis									Litigation - SEC Atlanta v IHI Books 1-4	Yes
WF 36	Wood & Francis									Exchange offer - Kara Int'l. Proxy into 1998, name change of Kara Int'l to IHI, reorganization - exchange of shares of IHI, NC w/ IHI Nevada (Kara) - 1998, Kara Int'l due diligence, exchange offer Blue Sky.	Yes
WF 37	Wood & Francis									IHI RECORDS EVIDENCE INVENTORY.woodfrancis.xls	

## WOOD FRANCIS, PLLC

BOX CODE	BOX #	SOURCE	INFOSTORE BOX # RECEIVED	DATE RECEIVED	DOC BEGIN	DOC END	DOC DATE	ADRESSEE TO	AUTHOR FROM	CONTENTS		GRAND JURY
										DOC DATE	DOC DATE	
WF 38	Wood & Francis									Convertible debenture due Dec. 1999; 4/1988 IHI conversion into common shares lists several European Banks; Affidavit of loss debenture - Swiss Bank Corp.	Yes	
WF 39	Wood & Francis				X					IHI litigation - 1988 (Lehendorfer v IHI; March v IHI; Mecklenstock v IHI; Swinney & Reddy v IHI; Unique Opportunities v IHI)	Yes	
WF 40	Wood & Francis				X					Kara IHI 10QSB - 1996, 1997, 1998; 10RSB - 1997, Rule 15c2-11; IHI quarterly reports 1998, shareholder docs.	Yes	
WF 41	Wood & Francis				X					IHI litigation matters - 1988 (States of Georgia, Michigan, Montana, NC & Alabama)	Yes	
WF 42	Wood & Francis				X					SEC Atlanta - request for information - May 1997, misc IHI docs (alphabetized A-C)	Yes	
WF 43	Wood & Francis				X					Misc IHI docs (alphabetized D-J); 1996 stock option docs	Yes	
WF 44	Wood & Francis				X					Comes re SEC - May 1987, March 1988; other regulatory comes.	Yes	
WF 45	Wood & Francis				X					Bd of Directors' meetings 1985-1986, unaudited income statement IHI for August 1986.	Yes	
WF 46	Wood & Francis				X					Financial info and SEC comes, packages to shareholders and IHI options 1987 offering, litigation docs	Yes	
WF 47	Wood & Francis				X					Conversion notices and related forms, Form S-R, noteholder list, other docs re private offering.	Yes	
WF 48	Wood & Francis				X					Representative training meeting docs, SEC v IHI docs, noteholder list, comes to John Brothers, SEC comes, Chapter 13 bankruptcy docs re John Brothers.	Yes	
WF 49	Wood & Francis				X					Executive mgmt meeting notes, V/P notes, Bd of Directors meeting minutes - Aug. 1997 - Oct. 1998, financial statements (unaudited) July 31, 1998 - Aug. 31, 1998.	Yes	
WF 50	Wood & Francis				X					S-K filing 3/16/98; S-K filing 3/16/98	Yes	
WF 51	Wood & Francis				X					IHI - Kara International docs, SEC filings, various IHI matters alphabetized (Y-Z).	Yes	
WF 52	Wood & Francis				X					SEC filings - July 1998, interest transfer - share exchange April 1998, employee stock option - August, 1998	Yes	
WF 53	Wood & Francis				X					IHI directors & officers docs, questionnaires, stock option plans, SEC filings, Claude Savage judgment.	Yes	
WF 54	Wood & Francis				X					IHI regulation D offering 1997	Yes	
WF 55	Wood & Francis				X					Bd of Directors meeting 1996-1997, IHI annual reports, shareholders proxy.	Yes	
WF 56	Wood & Francis				X					Bd of Directors' meetings June, 1997- Sept. 1998, year end reconciliation-1997, annual shareholders meeting - March 1998, insurance policy application, directors & officers questionnaires.	Yes	
WF 57	Wood & Francis				X					Regulation D shareholder docs, Regulation D offering - August, 1997.	Yes	
WF 58	Wood & Francis				X					March v IHI - report generated Form 2021.	Yes	
WF 59	Wood & Francis				X					Regulation S private placement, private placement memorandum, regulation S warrant exercise.	Yes	

## WOOD FRANCIS, PLLC

BOX CODE	BOX #	SOURCE	INFOSTORE BOX # RECEIVED	DATE RECEIVED	DOC ID	DOC FROM	DOC TO	DOC DATE	CONTENTS	
									GRAND JURY	
WF 60		Wood & Francis			X				IHI matters (alphabetized Cl-Corp) including compliance matters, consolidated financial statements 1985-1997, compensation plan, corporate general.	
WF 61		Wood & Francis			X					
WF 62		Wood & Francis			X				SEC v IHI - production of documents.	Yes
WF 63		Wood & Francis			X				IHI videotapes, Interwest transfer investment letters - 4/12/98, IHI training and leadership manual.	Yes
WF 64		Wood & Francis			X				Misc. files	Yes
WF 65		Wood & Francis			X				IRS stock option package 8/13/98; 12/19/97 stock options, IHI 1996 stock option plan, S-8 draft and stock option plan 1996.	Yes
WF 66		Wood & Francis			X				Leases, Investor relations, Form 8K, Jewels by Evonne - security agreement & promissory note, FTC v Jewellway complaint, Pamela Johnson promissory note, Karen Keamsey v IHI, various leases.	Yes
WF 67		Wood & Francis			X				IHI v SEC discovery (distributor summary and inquiry)	Yes
WF 68		Wood & Francis			X				IHI corporate notebooks containing stock register, stock certificates, minutes.	Yes
WF 69		Wood & Francis			X				IHI corporate notebooks including Articles of Incorporation, Bylaws, Bd of Directors minutes.	Yes
WF 70		Wood & Francis			X				Distributors lists	Yes
WF 71		Wood & Francis			X				Large amount of photocopied docs that appear to be a response to a request for production (possibly from SEC v IHI).	Yes
WF 72		Wood & Francis			X				Docs from Dwight Hallman - Atty client privilege.	Yes
WF 73		Wood & Francis			X				Binder of 1995 IHI shareholder docs, stock options exercised and related docs Sept. - Oct. 1996, Regulation S - expenses & fees 1997.	Yes
WF 74		Wood & Francis			X				Lit re to NC AG investigation; docs relating to SEC v IHI.	Yes
WF 75		Wood & Francis			X				IHI SEC Inquiry docs, comes to Investors March, 1997; law firm invoices re IHI litigation, Van Etten employment agreement, other employment docs, attorney notes, fax cover sheets from W&F, Business Judgment rule info.	Yes
WF 76		Wood & Francis			X				Various lease agreements, Reg D 506 offering, Bd Meeting notes.	Yes
WF 77		Wood & Francis			X				Malick comes to IHI while at Regestate, Liggett and Foley, Malick comes to IHI while at W&F, comes to W&F from other attorneys, invoices for legal services, various IHI matters alphabetized. Form S-8 docs.	Yes
WF 78		Wood & Francis			X				Draft of Form S-1, shareholder package, Reg D note conversion, info on IRS 1040's, lease agreements, 1995 shareholder meeting info, 1995 recession offer.	Yes
WF 79		Wood & Francis			X				Klata Rock comes, Voluntary Share Exchange docs, research on multi level marketing, SEC v IHI docs, 8-K filings.	Yes

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IH RECORDS/EVIDENCE INVENTORY									
BOX CODE	BOX #	SOURCE	INFOSTORE DATE RECEIVED	DOC RECEIVED	DOC COPY BEGIN	DOC END	AUTHOR FROM	ADDRESSEE TO	DOC DATE
CONTENTS									
WF	80	Wood & Francis		X					Reports to NC Attorney General's office Sept. 1997 - June 1988. Yes
WF	81	Wood & Francis		X					IHI v Dobbins docs, IRSR policies & procedures, IHI spreadsheets, discovery and pleadings - IHI v Dobbins, comes re IHI v Dobbins 1997 Yes
WF	82	Wood & Francis		X					Wood & Francis attorney notes, comes to Stan Van Etten, docs re IHI class action suits.
WF	83	Wood & Francis		X					SEC v IHI corrs, SEC v IHI complaint, SEC exhibits, Claude Savage bonus checks, legal research, personal file - Brent Wood Yes
WF	84	Wood & Francis		X					Various general comes re IHI, New Vision International docs, David Nemelka comes re personal loan to Van Etten, Meckenstock v IHI research.
WF	85	Wood & Francis		X					SEC v IHI info on Gerald Mansour, memo to Chris Reid, Meckenstock v IHI, draft responses to discovery, litigation related corrs, March 1997 Yes
WF	86	Wood & Francis		X					Marsh v IHI, various embezzlement action docs, SEC v IHI discovery and research, IHI v First Data docs.
									Legal research, documentation for response to discovery of defendants - IHI v First Data, other IHI v First Data docs, comes Oct. - Nov. 1998, Georgia Office of Consumer Affairs comes, SEC v IHI.
WF	87	Wood & Francis		X					IHI Rep Kit and Outline for hearing on preliminary injunction by Brent Wood
WF	88	Wood & Francis		X	WF-88-1	WF-88-73			IHI's copies of Audit documents 8 folder for YE 1997 and 6 folder for YE 1996, 1997 Canadian & 1 folder "Misc Docs"
WF	89	Wood & Francis		X	WF-89-1	WF-89-2241			34 boxes of copies - Original production for Grand Jury Subpoena
WF		Wood & Francis		X					4 Ikon boxes containing IHI video tapes which were used as exhibits in SEC v. IHI, including Bahama tapes
WF		Wood & Francis		X					Correspondence about Blue Sky, Rescission offer, U-7 offering, IHI financial condition.
W	1/1	Wyrick							Rescission offer matter
W	1/2	Wyrick							IHI shareholders list & correspondence provided to shareholders
W	1/3	Wyrick							Correspondence with SEC (1997-1998), Comes w/ Kristine Lanning (NC Consumer Affairs), discussions as to whether IHI violates NC laws
W	1/4	Wyrick							Yes
W	1/5	Wyrick							Yes
W		Black 3 rings binder in drawer 1							"SEC vs IHI" Vol. III
W	2/6	Wyrick							Numerous comes b/w IHI and State of NC; agreement w/ State of NC Yes
W	2/7	Wyrick							Comes b/w IHI & NC; numerous complaints; list of all IHI reps (but no date); copy of "NC AG Submissions" prepared by IHI.
W	2/8	Wyrick							Yes
									SEC investigation; memo whether RBA is an investment? Yes

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GRAND JURY						
BOX CODE	BOX #	SOURCE	INFOSTORE DATE RECEIVED	DOC BEGIN	DOC END	DOC DATE
ADDRESSEE TO	AUTHOR FROM	CONTENTS				
W	29	Wyrick				SEC complaint, comes w/ regulatory agencies in various states; 5/30/97 from Bell to IHF re voice message from SV/E that said the info Jim Long (SEC Atlanta) wanted "wouldn't cause any alarms to go off"; Claude Savage placed on probation; Letter from Jim Long stating IHF may be in violation of Fed SEC laws.
W	3	Wyrick		X		Vols I & II SEC vs IHF; IHF Ex Parte Hearing 3/98; Prelim Inj hearing 3/98 Yes